## EXHIBIT D TO FOURTH INTERIM FEE APPLICATION OF WOLLMUTH MAHER & DEUTSCH LLP FOR THE PERIOD OCTOBER 1, 2011 THROUGH MARCH 6, 2012

#### WOLLMUTH MAHER & DEUTSCH LLP

A LIMITED LIABILITY PARTNERSHIP FORMED IN NEW YORK

ONE GATEWAY CENTER NEWARK, NEW JERSEY 07102

> TELEPHONE (973) 733-9200 FACSIMILE (973) 733-9292

March 27, 2012

#### VIA FEDERAL EXPRESS OVERNIGHT DELIVERY

To: All Persons on the Annexed Service List

Re: Lehman Brothers Holdings Inc., et al.

Case No. 08-13555 (JMP)

Dear Sir or Madam:

Enclosed please find the Firm's Fifteenth Monthly Invoice as Special Counsel to the Debtors and Debtors-in-Possession.

Should you have any questions, please do not hesitate to contact me.

Very truly yours,

John D. Giampolo

John D. Groupslo 10

Encs.

#### Service List

Lehman Brothers Holdings Inc. 1271 Avenue of the Americas, 45<sup>th</sup> Floor New York, NY 10020 Attn: John Suckow and William Fox (with electronic LEDES version)

Weil, Gotshal & Manges, LLP 767 Fifth Avenue New York, NY 10153 Attn: Shai Y. Waisman, Esq.

Milbank, Tweed, Hadley & McCloy LLP 1 Chase Manhattan Plaza New York, NY 10005 Attn: Dennis F. Dunne, Esq., Dennis O'Donnell, Esq., and Evan Fleck, Esq. Attorneys for the Creditors' Committee

The Office of the United States Trustee for the Southern District of New York 33 Whitehall Street, 22<sup>nd</sup> Floor New York, NY 10004
Attn: Elisabetta G. Gasparini, Esq., and Andrea B. Schwartz, Esq. (with electronic LEDES version)

Godfrey & Kahn S.C.
One East Main Street
Madison, WI 53703
Attn: Richard Gitlin
Chair of the Fee Committee
(with electronic LEDES version)

BrownGreer PLC
Attn: Leah Barbour and Brandon Deal
115 S. 15th Street, Suite 400
Richmond, Virginia 23219-4209
(with electronic LEDES version)

WOLLMUTH MAHER & DEUTSCH LLP

500 Fifth Avenue

New York, New York 10110 Telephone: (212) 382-3300 Facsimile: (212) 382-0050

William A. Maher Paul R. DeFilippo James N. Lawlor

Special Litigation Counsel

for the Debtors and Debtors-in-Possession

### UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

|                                       | X |                        |
|---------------------------------------|---|------------------------|
|                                       |   | Chapter 11             |
| In re:                                | : | Cogo No. 09 12555 (IMD |
| LEHMAN BROTHERS HOLDINGS INC., et al. |   | Case No. 08-13555 (JMP |
| Debtors.                              | : |                        |
|                                       | X |                        |

# FIFTEENTH MONTHLY FEE APPLICATION OF WOLLMUTH MAHER & DEUTSCH LLP FOR COMPENSATION OF SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS SPECIAL COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION

Name of Applicant: Wollmuth Maher & Deutsch LLP

Authorized to Provide

Professional Services to: Debtors and Debtors-in-Possession

Date of Retention: Order Entered October 20, 2010 [Docket No. 12406]

Nunc Pro Tunc to September 9, 2010

Compensation Period: December 1, 2011 to December 31, 2011

Amount of

Compensation Sought: \$109,401.75

Amount of Expense

Reimbursement Sought: \$3,943.29

80% of Compensation Sought as Actual, Reasonable and

Necessary: \$87,521.40

| 08-13555-mg | Doc 27994-4 | Filed 05/21/12 | Entered 05/21/12 18:33:27 | Exhibit D |
|-------------|-------------|----------------|---------------------------|-----------|
|             |             | Pg 5 of 7      | 0                         |           |
|             |             |                |                           |           |

| This is a:                       | X Monthly       | Interim       | Final Application         |
|----------------------------------|-----------------|---------------|---------------------------|
| This is Wollmuth Maher & Deutsch | LLP's fifteenth | monthly fee a | application in this case. |

#### **Timekeeper Summary**

| Timekeeper             | Position          | Year of<br>Admission  | Rate   | Hours | Amount    |
|------------------------|-------------------|---|--------|-------|-----------|
| William A.<br>Maher    | Senior<br>Partner | Area of Expertise: Litigation. Member of the New York Bar (1986), New Jersey Bar (1998). Joined the firm in 1998.             | 650.00 | 12.20 | 7,930.00  |
| Sandip<br>Bhattacharji | Partner           | Area of Expertise:<br>Litigation.<br>Member of the<br>New York Bar<br>(1991). Joined the<br>firm in 2006.                     | 595.00 | 6.20  | 3,689.00  |
| Randall<br>Rainer      | Partner           | Area of Expertise: Litigation. Member of the New York Bar (1995). Joined the firm in 2000.                                    | 595.00 | 21    | 12,495.00 |
| James N.<br>Lawlor     | Partner           | Area of Expertise: Litigation, Bankruptcy. Member of the New York Bar (1993), New Jersey Bar (1992). Joined the firm in 2002. | 595.00 | 2.50  | 1,487.50  |
| Vince<br>Change        | Partner           | Area of Expertise:<br>Litigation.<br>Member of the<br>New York Bar<br>(1990). Joined the<br>firm in 2002.                     | 595.00 | 26.20 | 15,589.00 |
| William F.<br>Dahill   | Partner           | Area of Expertise:<br>Litigation.<br>Member of the<br>New York Bar<br>(1992). Joined the<br>firm in 1998.                     | 595.00 | 1.50  | 892.50    |

| Adam M.<br>Bialek         | Counsel   | Area of Expertise: Litigation. Member of the New York Bar (2002), New Jersey Bar (2002). Joined the firm in 2005.             | 450.00 | 64.30 | 28,935.00 |
|---------------------------|-----------|---|--------|-------|-----------|
| Paul R. Weber             | Associate | Area of Expertise: Corporate. Member of the New Jersey Bar (2007), New York Bar (2008) Joined the firm in 2008                | 325.00 | .9    | 292.50    |
| John D.<br>Giampolo       | Associate | Area of Expertise: Litigation, Bankruptcy. Member of the New York Bar (2005), New Jersey Bar (2005). Joined the firm in 2010. | 395.00 | 4.60  | 1,817.00  |
| Fletcher W.<br>Strong     | Associate | Area of Expertise: Litigation, Bankruptcy. Member of the New York Bar (2010). Joined the firm in 2011.                        | 275.00 | 20.3  | 5,582.50  |
| Melissa A.<br>Finkelstein | Associate | Area of Expertise: Litigation. Membership to New York Bar currently pending. Joined the firm in 2011.                         | 250.00 | 33.20 | 8,300.00  |
| Alexis<br>Castillo        | Associate | Area of Expertise: Litigation. Member of the New York Bar (2010). Joined the firm in 2009.                                    | 275.00 | 68.70 | 18,892.50 |

## 08-13555-mg Doc 27994-4 Filed 05/21/12 Entered 05/21/12 18:33:27 Exhibit D Pg 8 of 70

| Rahil      | Associate | Area of Expertise:  | 250.00 | 4.75   | 1,187.50     |
|------------|-----------|---------------------|--------|--------|--------------|
| Kamran-Rad |           | Litigation. Member  |        |        | ·            |
|            |           | of the New York     |        |        |              |
|            |           | Bar (2010),         |        |        |              |
|            |           | Massachusetts Bar   |        |        |              |
|            |           | (2009). Joined the  |        |        |              |
|            |           | firm in 2011.       |        |        |              |
| Kenneth J. | Associate | Area of Expertise:  | 425.00 | 1.60   | 680.00       |
| Miles      |           | Litigation. Member  |        |        |              |
|            |           | of the New York     |        |        |              |
|            |           | Bar (2003),         |        |        |              |
|            |           | Connecticut (2002). |        |        |              |
|            |           | Joined the firm in  |        |        |              |
|            |           | 2005.               |        |        |              |
| Martina    | Paralegal |                     | 115.00 | 1.00   | 115.00       |
| Frederick  |           |                     |        |        |              |
| Hetty Kim  | Paralegal |                     | 115.00 | 8.40   | 966.00       |
| Agatha D.  | Paralegal |                     | 115.00 | 6.60   | 759.00       |
| Rysinski   |           |                     |        |        |              |
|            |           |                     | Total  | 283.95 | \$109,610.00 |

#### **Summary of Services**

| SERVICE  | HOURS  | VALUE        |
|--|--------|--------------|
| Case Administration                                  | 29.90  | \$16,054.00  |
| Fee/Employment Applications                          | 3.20   | \$1,484.00   |
| Litigation-Other than Avoidance<br>Action Litigation | 24.00  | \$11,935.00  |
| Avoidance Action Litigation                          | 226.15 | \$79,720.50  |
| Travel   | 0.70   | 416.50       |
| Subtotal:  | 283.95 | 109,610.00   |
| Less ½ Travel Time                                   | (0.35) | (208.25)     |
| TOTAL SERVICES:                                      | 283.60 | \$109,401.75 |

#### **SUMMARY OF DISBURSEMENTS**

| DISBURSEMENTS   | VALUE      |
|---|------------|
| 1. Photocopy Expense  | 12.45      |
| 2. Demovsky Lawyer Services                                     | 1,591.69   |
| 3. Subpoena Fees  | 285.00     |
| 4. Witness Fees   | 688.00     |
| 5. Federal Express  | 955.79     |
| 6. Court Fees   | 40.00      |
| 7. Other Professionals (Service of Process on Foreign Entities) | 225.00     |
| 8. Copper Conferencing  | 129.36     |
| 9. Other  | 16.00      |
| TOTAL DISBURSEMENTS:  | \$3,943.29 |

08-13555-mg Doc 27994-4 Filed 05/21/12 Entered 05/21/12 18:33:27 Exhibit D Pg 10 of 70

WOLLMUTH MAHER & DEUTSCH LLP

500 Fifth Avenue

New York, New York 10110 Telephone: (212) 382-3300 Facsimile: (212) 382-0050

William A. Maher Paul R. DeFilippo James N. Lawlor

Special Litigation Counsel for the Debtors and Debtors In Possession

### UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

|                                       | X |                            |
|---------------------------------------|---|----------------------------|
|                                       |   | Chapter 11                 |
| In re:                                | : | Case No. 08-13555 (JMP)    |
| LEHMAN BROTHERS HOLDINGS INC., et al. |   | Case 140. 00-13333 (31411) |
| Debtors.                              | : |                            |
|                                       | X |                            |

# FIFTEENTH MONTHLY FEE APPLICATION OF WOLLMUTH MAHER & DEUTSCH LLP FOR COMPENSATION OF SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES AS SPECIAL COUNSEL TO THE DEBTORS AND DEBTORS-IN-POSSESSION

By this application (this "<u>Application</u>"), pursuant to sections 330 and 331 of title 11 of the United States Code (the "<u>Bankruptcy Code</u>"), and Rule 2016 of the Federal Rules of Bankruptcy Procedure (the "<u>Bankruptcy Rules</u>"), Wollmuth Maher & Deutsch LLP ("<u>Wollmuth</u>" or the "<u>Firm</u>") hereby seeks reasonable compensation for professional legal services rendered as special litigation counsel to Lehman Brothers Holdings, Inc. ("<u>LBHI</u>") and its affiliated debtors in the above-captioned chapter 11 cases (collectively, the "<u>Debtors</u>") in the amount of \$109,401.75, together with reimbursement for actual and necessary expenses incurred in the amount of \$3,943.29 for the period commencing December 1, 2011 through and including December 31, 2011 (the "<u>Compensation Period</u>"). Pursuant to the Fourth Amended Order

Pursuant to Sections 105(a) and 331 of the Bankruptcy Code and Bankruptcy Rule 2016(a) Establishing Procedures for Interim Monthly Compensation and Reimbursement of Expenses of Professionals dated April 14, 2011 [Docket No. 15997] establishing procedures for interim compensation and reimbursement of professionals (the "Compensation Order"), Wollmuth seeks reimbursement of 80% of its total reasonable and necessary fees incurred, in the amount of \$87,521.40, together with 100% reimbursement for actual and necessary expenses incurred in the amount of \$3,943.29, for the Compensation Period. In support of this Application, Wollmuth represents as follows:

#### **BACKGROUND**

- 1. Commencing on September 15, 2008 and periodically thereafter (as applicable, the "Commencement Date"), LBHI and certain of its subsidiaries commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code. The Debtors' chapter 11 cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"). The Debtors are authorized to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.
- 2. On September 17, 2008, the United States Trustee for the Southern District of New York (the "<u>U.S. Trustee</u>") appointed the statutory committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code (the "<u>Creditors' Committee</u>").
- 3. On September 19, 2008, a proceeding was commenced under the Securities Investor Protection Act of 1970 ("<u>SIPA</u>") with respect to Lehman Brothers Inc. ("<u>LBI</u>"). A trustee appointed under SIPA is administering LBI's estate.

- 4. On January 19, 2009, the U.S. Trustee appointed Anton R. Valukas as examiner in the above-captioned chapter 11 cases (the "Examiner") and by order, dated January 20, 2009 [Docket No. 2583] the Court approved the U.S. Trustee's appointment of the Examiner. The Examiner issued a report of his investigation pursuant to section 1106 of the Bankruptcy Code on March 11, 2010 [Docket No. 7531].
- 5. On April 14, 2010, the Debtors filed a revised joint chapter 11 plan and disclosure statement [Docket Nos. 8330 and 8332].
- 6. On October 1, 2010, the Debtors filed an application [Docket No. 11761] to retain Wollmuth to serve as conflicts and special litigation counsel, in connection with the prosecution of certain avoidance actions brought pursuant to sections 547 and 548 of the Bankruptcy Code and other related claims, and such other litigation related matters as may be assigned by the Debtors (together, the "Representative Matters").
- 7. On October 28, 2010, this Court entered an Order that approved Wollmuth's retention as counsel to the Debtors [Docket No. 11872] (the "Retention Order") *nunc pro tunc* to September 9, 2010.
- 8. On December 6, 2011, the Bankruptcy Court entered an order confirming the Debtors' Third Amended Joint Chapter 11 Plan [Docket No. 23023].
- 9. On March 6, 2012, the Debtors' Third Amended Joint Chapter 11 Plan became effective pursuant to the Notice of Effective Date and Distribution Date in Connection with the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc., and its Affiliated Debtors [Docket No. 26039].

#### **JURISDICTION AND VENUE**

10. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). The statutory predicates for the relief requested herein are sections 330 and 331 of the Bankruptcy Code.

#### RELIEF REQUESTED

- All services for which Wollmuth requests compensation were performed for, or on behalf of, the Debtors. In connection with the professional services rendered, by this Application, Wollmuth seeks compensation in the amount of \$109,401.75 (80% of the actual compensation sought is \$87,521.40) and expense reimbursement of \$3,943.29. Attached hereto as Exhibit A is a detailed explanation of hours spent rendering legal services to the Debtors supporting Wollmuth's request of \$109,401.75 in compensation for fees incurred during the Compensation Period. Attached hereto as Exhibit B is a detailed list of disbursements made by Wollmuth supporting its request of \$3,943.29 in expense reimbursement for the Compensation Period.
- 12. Given the nature and value of the services that Wollmuth provided to the Debtors as described herein, the amounts sought under this Application are fair and reasonable under section 330 of the Bankruptcy Code given the complexity of this case; the time expended by attorneys and professionals; the nature and extent of the services rendered; the value of such services; and the costs of comparable services other than in a case under the Bankruptcy Code.
- 13. Wollmuth has received no payment and no promises for payment from any source for services rendered in connection with this case other than those in accordance with the Bankruptcy Rules. There is no agreement or understanding between Wollmuth and any other

08-13555-mg Doc 27994-4 Filed 05/21/12 Entered 05/21/12 18:33:27 Exhibit D Pg 14 of 70

person (other than members of Wollmuth) for the sharing of compensation to be received for the services rendered in this case.

#### **SUMMARY OF SERVICES RENDERED**

- 14. In rendering services to the Debtors during its chapter 11 case, the Firm's legal team has been composed primarily of professionals with extensive experience in bankruptcy and in the applicable legal practice areas for the matters for which the Firm was retained. These professionals have coordinated assignments, both internally and with the Debtors' general counsel, Weil, Gotshal & Manges, LLP, and conflicts counsel, Curtis Mallet-Prevost, Colt & Mosle, LLP, to maximize efficiency and avoid any duplication of effort.
- 15. All services were rendered by Wollmuth at the request of the Debtors and were necessary, reasonable and appropriate under the circumstances and beneficial to the estates at the time the services were rendered. The compensation sought by Wollmuth in this Application is comparable to or less than customary compensation sought by comparably skilled professionals in cases under the Bankruptcy Code. In addition, the compensation sought is based on Wollmuth's standard and usual rates for similar services in representations other than under the Bankruptcy Code.
- 16. The services provided by Wollmuth during the Compensation Period were rendered to ensure no unnecessary duplication and are grouped into the billing categories set forth in Exhibit A. The attorneys and professionals who rendered services relating to each category are identified in the above attachment and summaries of the hours and fees of each for the Compensation Period and the total compensation by billing category are included in Exhibit A. Because detailed invoices of the services rendered by Wollmuth are attached as Exhibit A, the following descriptions will describe only in summary form the services performed by

08-13555-mg Doc 27994-4 Filed 05/21/12 Entered 05/21/12 18:33:27 Exhibit D Pg 15 of 70

Wollmuth.

#### A. <u>SPV Payment Priority Litigation - 001</u>

17. By far the largest portion of the Firm's services during the Compensation Period were provided in connection with the continued prosecution of an adversary proceeding (i) to prevent certain unenforceable *ipso facto* clauses from improperly modifying the right of Lehman Brothers Special Financing Inc. ("LBSF") to priority of payment of more than \$3 billion dollars under certain transaction documents related to credit default swap agreements based solely upon the filing of LBSF and its ultimate parent, LBHI, for bankruptcy; and (ii) to recover funds that were improperly paid to noteholders. On September 9, 2010, the Firm was formally asked to serve as counsel as a result of conflicts of interest identified by Weil, Gotshal and Curtis Mallet-Prevost firms.

18. During the Compensation Period, the Firm prepared discovery requests, including, without limitation, deposition notices, to named defendants and relevant third parties in an effort to quickly identify parties that may need to be added as additional defendants in the litigation, as well as to obtain other critical information. The Firm also focused significant time and effort in serving process and discovery requests on the multiple named defendants and relevant third parties, both within and outside the United States. These services included coordinating with multiple process services in multiple jurisdictions, reviewing and analyzing various documents to confirm that proper service was effected, and engaging in numerous communications with various defendants, third parties, and counsel for defendants and third parties to address various issues raised by defendants and third parties with respect to discovery requests.

<sup>&</sup>lt;sup>1</sup> The Firm filed an adversary encaptioned <u>Lehman Bros. Spec. Fin., Inc. v. Bank of America, N.A.</u>, Adv. Proc. No. 10-03547 (JMP).

08-13555-mg Doc 27994-4 Filed 05/21/12 Entered 05/21/12 18:33:27 Exhibit D Pg 16 of 70

- During the Compensation Period, the Firm also reviewed and analyzed extensive document production and other information received in response to discovery requests that had been served on defendants and relevant third parties, as well as prepared responses to discovery requests from named defendants and relevant third parties and reviewed and prepared responses to objections to discovery requests from named defendants and relevant third parties. Additionally, in order to aid in prosecution of the litigation, the Firm prepared and continued to revise and update memoranda outlining all the relevant underlying transactions and disbursements to the various defendants, categorized based on the relevant class and tranche of the distributee, as detailed in the discovery responses received from the defendants. Based upon the document production received, the Firm entered into potential settlement negotiations with certain parties.
- 20. The Firm drafted and continued to revise, finalize and submit a motion to extend time to serve process and conduct further expedited discovery. The Firm also reviewed certain objections to the Debtors' Proposed Plan based upon the assumption of Pyxis swaps.
- 21. During the Compensation Period, the Firm continued researching, analyzing and drafting a complex motion to amend the complaint in this adversary proceeding to include numerous additional defendants. The Firm also continued drafting an amended version of the complaint. Further, the Firm conducted extensive legal research on various procedural and substantive issues related to amending the complaint at this stage in the litigation.
- 22. During the Compensation Period, the Firm continued to monitor important developments in the Debtors' cases that had implications for the litigation.

08-13555-mg Doc 27994-4 Filed 05/21/12 Entered 05/21/12 18:33:27 Exhibit D Pg 17 of 70

- 23. Members of the Firm also researched and addressed critical legal and factual issues that arose in the litigation during the Compensation Period, including, without limitation, jurisdictional issues concerning foreign defendants and certain potential or future defendants.
- 24. The Firm also provided services revising and commenting on settlement agreements and stipulations for dismissal as to certain parties and researching procedural and substantive issues relevant to same.
- 25. The Firm kept in constant contact with the Debtors' management team and other counsel to coordinate efforts and to maintain a common legal position with various related litigation.

#### B. Koch Avoidance Litigation - 003

- 26. The Firm was asked to assist in the potential filing of an avoidance action involving certain Koch entities. While the Debtors had previously reached an agreement with the Koch entities to toll the statute of limitations, the Firm was advised that the agreement may be terminated shortly by the Koch entities. Accordingly, the Firm began on an expedited basis to prepare should litigation have to be filed to preserve the estates' rights.
- 27. The Firm assisted the Debtors in preparing for the potential that the Koch matters be addressed in the Debtors' existing alternative dispute resolution ("ADR") procedures or by a modified form of same. Accordingly, members of the Firm worked closely with the Debtors' management and other counsel to coordinate both a potential amendment of the tolling agreement with the Koch entities and the potential noticing and prosecution of an ADR proceeding. The Firm also worked to address potential discovery and damages issues raised by the Koch entities and engaged in settlement negotiations.

08-13555-mg Doc 27994-4 Filed 05/21/12 Entered 05/21/12 18:33:27 Exhibit D Pg 18 of 70

#### C. Bank of China Subpoenas - 005

- 28. The Firm was asked to investigate the valuation of certain derivatives contracts that certain of the Debtors held in conjunction with Bank of China. Specifically, the Firm was asked to investigate the process in which Bank of China received its price quotes from various banks in the termination of such contracts. Accordingly, the Firm began on an expedited basis to conduct discovery on the banks to determine whether the valuation process was properly conducted.
- 29. To this end, the Firm researched issues related to issuing Bankruptcy Rule 2004 subpoenas on the parties, and drafted and revised such subpoenas to be served to various parties. After issuance of such subpoenas, the Firm investigated proofs of claim filed by the aforesaid banks in the Debtors' bankruptcy.
- 30. Research was conducted as to the proper procedure for issuing subpoenas and giving the Court notice of same based on all circumstances surrounding this matter. Based upon the research conducted, the Firm also drafted notices of subpoenas issued to give the Court notice of all 2004 subpoenas issued.
- 31. During the Compensation Period, the Firm also reviewed numerous responses to the subpoenas issued, met and conferred with counsel for certain responding parties and negotiated extensions of time for responses to subpoenas.

#### D. **GSAM - 006**

32. Similar to the foregoing Bank of China Subpoenas – 005 matter, the Firm was also asked to investigate the valuation of numerous derivatives contracts that were liquidated in 2008. The counter-parties to the derivatives contracts were various Goldman Sachs entities, and each of the contracts was being managed by Goldman Sachs Asset Management.

08-13555-mg Doc 27994-4 Filed 05/21/12 Entered 05/21/12 18:33:27 Exhibit D Pg 19 of 70

- 33. Thus, the Firm was asked to investigate whether the procedure for determining the termination fee assigned to each of the derivatives contracts was properly conducted.
- 34. During the Compensation Period, the Firm drafted and issued Bankruptcy Rule 2004 subpoenas on the relevant parties. The Firm also analyzed, reviewed and responded to various objections to the subpoenas and met and conferred with the various parties. Additionally, the Firm engaged in communications and meetings with the Debtors' management team in order coordinate and narrow the scope of information sought under the subpoenas.

#### E. Katten Muchin - 007

- 35. The Firm was asked to investigate possible malpractice claims against a law firm related to the Debtors' liens on real property. The Firm was also asked to investigate issues concerning negligent expiration and/or subordination of the Debtors' liens on real property in connection with the law firm retained to handle such issues on behalf of the Debtors during the relevant times. The Firm investigated and analyzed the Debtors' potential claims against prior counsel.
- 36. During the Compensation Period, the Firm continued its initial discovery into the Debtors' foregoing potential claims, including, without limitation, retrieval of case records and legal research concerning the potential claims, especially related to New York Lien Law. The Firm also reviewed procedural issues related to the viability of the potential claims, including, without limitation, statute of limitations and tolling issues. The Firm reviewed similar issues related to the tolling agreement between the Debtors and prior counsel.
- 37. During the Compensation Period, the Firm worked to effect service on defendants of a summons and complaint on behalf of the Debtors for this matter. The Firm also continued initial investigations into the case, including identifying and locating potential witnesses.

Additionally, the Firm communicated with counsel for certain defendants and negotiated extensions of time to respond to the complaint in this matter.

#### **COMPENSATION REQUESTED**

- 38. For the Compensation Period, Wollmuth seeks compensation in the amount of \$109,401.75 (80% of the total fees incurred during the Compensation period is \$87,521.40) in connection with the professional services summarized above and detailed in Exhibit A, and total costs and expenses in the amount of \$3,943.29 as detailed in Exhibit B.
- 39. It is Wollmuth's policy to charge its clients in all areas of practice the amounts incurred by Wollmuth for identifiable, non-overhead expenses incurred in connection with the client's case that would not have been incurred except for representation of that particular client. Examples of such expenses are postage, overnight mail, courier delivery, computer assisted legal research, photocopying, outgoing facsimile transmissions, transportation and long-distance telephone.
- 40. Wollmuth represents as follows with regard to its charges for actual and necessary costs and expenses during the Compensation Period:
  - (a) Long-distance telephone charges are billed at actual costs;
  - (b) Photocopy charges are \$.10 per page;
  - (c) Incoming facsimiles are not billed. Outgoing facsimiles are billed at the rate of \$1.00 per page; and,
  - (d) Outside information services, including computer assisted legal research and PACER, are billed at actual costs.
  - (e) car services are capped at \$100.00 per hour and only permitted for travel after 8:00 p.m.
  - (f) meals charges are billed at actual cost but are capped at \$20 per person and are only charged for meals after normal business hours or on weekends

08-13555-mg Doc 27994-4 Filed 05/21/12 Entered 05/21/12 18:33:27 Exhibit D Pg 21 of 70

41. In accordance with the factors enumerated in section 330 of the Bankruptcy Code,

the amounts requested for compensation and expense reimbursement are fair and reasonable

given: (a) the complexity of these cases; (b) the time expended; (c) the nature and extent of the

services rendered; (d) the value of such services; and (e) the cost of comparable services other

than in a case under the Bankruptcy Code.

42. The undersigned has reviewed the requirements of Local Rule 2016-2, and

certifies that this Application and the Exhibits attached hereto comply therewith and a copy of

this Application has been sent to the parties set forth in the Compensation Order.

WHEREFORE, the Firm asks the Court to approve for the current Compensation Period

the sum of \$109,401.75 representing the total compensation for professional services rendered,

80% or \$87,521.40 of which is to be currently paid, and the sum of \$3,943.29 for reimbursement

of actual and necessary costs and expenses incurred by it in these cases from December 1, 2011

through December 31, 2011.

Respectfully submitted,

By: /s/ James N. Lawlor

William A. Maher

Paul R DeFilippo

James N. Lawlor

WOLLMUTH MAHER & DEUTSCH LLP

500 Fifth Avenue

New York, New York 10110

Telephone: (212) 382-3300

Facsimile: (212) 382-0050

Special Counsel for the

Debtors and Debtors-in-Possession

Dated: New York, New York

March 27, 2012

18

## EXHIBIT A

#### Wollmuth Maher & Deutsch

500 Fifth Avenue, Suite 1200 One Gateway Center, 9th Fl.
New York, New York 10110 Newark, New Jersey 07102

T: 212-382-3300 T: 973-733-9200 F: 212-382-0050 F: 973-733-9292

Lehman Estate March 27, 2012

File #: 4715-001 Inv #: 22186

#### Attention:

**RE:** SPV Avoidance Litigation

#### **SUMMARY BY TASK**

| Task |   | Hours  | Amount       |
|------|---|--------|--------------|
| C04  | Case Administration                               | 29.90  | 16,054.00    |
| C07  | Fee/Employment Applications                       | 3.20   | 1,484.00     |
| C10  | Litigation-Other than Avoidance Action Litigation | 24.00  | 11,935.00    |
| C11  | Avoidance Action Litigation                       | 226.15 | 79,720.50    |
| C16  | Travel  | 0.70   | 416.50       |
|      | Total   | 283.95 | \$109,610.00 |
|      | Grand Total                                       | 283.95 | \$109,610.00 |

#### **SUMMARY BY TIMEKEEPER**

|                        |                | This Invoice |       |           |  |
|------------------------|----------------|--------------|-------|-----------|--|
| Timekeeper             | Category       | Rate         | Hours | Amount    |  |
| William A. Maher       | Senior Partner | 650.00       | 12.20 | 7,930.00  |  |
| Sandip Bhattacharji    | Partner        | 595.00       | 6.20  | 3,689.00  |  |
| Randall R.Rainer       | Partner        | 595.00       | 21.00 | 12,495.00 |  |
| James N. Lawlor        | Partner        | 595.00       | 2.50  | 1,487.50  |  |
| Vince Chang            | Partner        | 595.00       | 26.20 | 15,589.00 |  |
| William F. Dahill      | Partner        | 595.00       | 1.50  | 892.50    |  |
| Adam M. Bialek         | Junior Partner | 450.00       | 64.30 | 28,935.00 |  |
| Paul Weber             | Associate      | 325.00       | 0.90  | 292.50    |  |
| John D. Giampolo       | Associate      | 395.00       | 4.60  | 1,817.00  |  |
| Fletcher Strong        | Associate      | 275.00       | 20.30 | 5,582.50  |  |
| Melissa A. Finkelstein | Associate      | 250.00       | 33.20 | 8,300.00  |  |

| Invoice   | 08-13555-mg<br>#: 22186 | Doc 27994-4      | Filed 05 | /21/12<br>5 24 of 7 | Entered 05/2 | 21/12 18:33:27 | Exhibit D | March |
|-----------|-------------------------|------------------|----------|---------------------|--------------|----------------|-----------|-------|
| Alexis C  | astillo                 | Associate        | 275.00   | 68.70               | 18,892.50    |                |           |       |
| Rahil Ka  | mran-Rad                | Associate        | 250.00   | 4.75                | 1,187.50     |                |           |       |
| Kenneth   | J. Miles                | Associate        | 425.00   | 1.60                | 680.00       |                |           |       |
| Martina I | Frederick               | Paralegal        | 115.00   | 1.00                | 115.00       |                |           |       |
| Hetty Kir | m                       | Paralegal        | 115.00   | 8.40                | 966.00       |                |           |       |
| Agatha D  | ). Rysinski             | Paralegal        | 115.00   | 6.60                | 759.00       |                |           |       |
|           | Total                   |                  |          |                     | \$109,610.00 |                |           |       |
|           |                         | DISBURS          | EMENT    | SUMM                | ARY          |                |           |       |
| CoppC     | Copper Conferen         | ncing Inv.#      |          |                     |              | 129.36         |           |       |
| dem       | Demovsky Lawy           | er Service Inv.# |          |                     |              | 1,591.69       |           |       |
| E112      | Court Fees              |                  |          |                     |              | 40.00          |           |       |
| E113      | Subpoena Fees           |                  |          |                     |              | 301.00         |           |       |
| E114      | Witness Fees            |                  |          |                     |              | 688.00         |           |       |
| E123      | Other profession        | als              |          |                     |              | 225.00         |           |       |
| FDX       | Federal Express         | Inv#             |          |                     |              | 955.79         |           |       |
| phx       | Photocopy Exper         | nse              |          |                     |              | 12.45          |           |       |
|           |                         |                  |          |                     |              |                |           |       |

\$3,943.29

**Total Disbursements** 

March

**SCB** 

Dec-02-11

Avoidance Action Litigation; Review indenture 0.30 178.50 notice provisions re: Trustee and issuer obligations to notify noteholders of legal

Structured Credit Opportunities Fund,

and Gatex Properties for MAF (3900)

proceedings (3900)

Structured Credit America, Silver Elms CDO,

| 3555-mg Doc 27994-4   | Filed 05/21/12 E                         | ntered 05 | /21/12 18:33:27 | Exhibit [ |
|---|--|-----------|-----------------|-----------|
| Avoidance Action Litigation action issues and relation ba amending complaint (3900)   | ick as relevant to                       | 1.50      | 892.50          | VTC       |
| Avoidance Action Litigation complex motion to amend c many (hundreds) of addition   | n; Continue drafting omplaint to include | 7.70      | 3,465.00        | AMB       |
| Avoidance Action Litigation AHC re: whether affidavit of been drafted and served (02)   | of service re: Caylon                    | 0.10      | 45.00           | AMB       |
| Avoidance Action Litigation from V. Farron re: service o Omicron in Austria (3900)  |  | 0.10      | 45.00           | AMB       |
| Avoidance Action Litigation<br>SCB re: potential notice of I<br>Trustee provided to the pote<br>defendants for motion to an<br>complaint (3900) | lawsuit that the ential noteholder       | 0.10      | 45.00           | AMB       |
| Avoidance Action Litigation<br>Clareman from Citi re: nam<br>certain potential Noteholder   | e and address for                        | 0.10      | 45.00           | AMB       |
| Avoidance Action Litigation counsel for Brookfield re: re respond to subpoena seeking distributions (3900)                                      | equest for time to                       | 0.10      | 45.00           | AMB       |
| Avoidance Action Litigation re: prejudice in filing amend defendants in Second Circuit  | led complaint on                         | 1.60      | 440.00          | FWS       |
| Avoidance Action Litigation<br>Moore's Federal Practice re<br>amended complaint (3900)  | n: Reviewed                              | 0.80      | 220.00          | FWS       |
| Avoidance Action Litigation<br>analysis re: standard for amo<br>Second Circuit to AMB (02   | ended complaint in                       | 0.30      | 82.50           | FWS       |
| Avoidance Action Litigation revise list of incoming poter reflect date of notice for pur amended complaint (3900)                               | n; Review and ntial noteholders to       | 1.90      | 522.50          | AHC       |
| Avoidance Action Litigation correspondence re: full legal of Canada Trust (3900)  |  | 0.20      | 55.00           | AHC       |
| Avoidance Action Litigation re complete name of Sun Liti(0200)  |  | 0.10      | 27.50           | AHC       |
| Avoidance Action Litigation of service of motion to exter (3900)  |  | 0.20      | 55.00           | AHC       |
| Avoidance Action Litigation   |  | 0.30      | 82.50           | AHC       |

Anderson emails and follow up issues for

| Invoice #: | 3555 <sub>2786</sub> Doc 27994-4 Filed 05/21<br>Pg <sup>2</sup> 2   | /12 Entered 09<br>7 of 70 | 5/21/12 18:33:27 | Exhibit D |
|------------|---|---------------------------|------------------|-----------|
|            | service of discovery upon potential noteho (0200)   | olders                    |                  |           |
| Dec-04-11  | Avoidance Action Litigation; Prep of mot amend amended complaint (3900)   | ion to 3.90               | 1,755.00         | AMB       |
|            | Avoidance Action Litigation; Continue to schedule to be attached to amended comp (3900)   |                           | 1,127.50         | AHC       |
|            | Avoidance Action Litigation; Review LBI previous draft of motion to extend stay of discovery for purposes of drafting update  |                           | 110.00           | АНС       |
| Dec-05-11  | distributed action portion of brief (3900)<br>Avoidance Action Litigation; Emails from<br>and RRR re: scope of retention covering re<br>matter in which Jones Day is conflicted (0                        | ew                        | 297.50           | JNL       |
|            | Avoidance Action Litigation; Research se 550 issues relevant to SPV litigation (390)  |                           | 1,547.00         | VTC       |
|            | Avoidance Action Litigation; Research Krissue as relevant to amending complaint (   | rupski 2.10               | 1,249.50         | VTC       |
|            | Avoidance Action Litigation; Research 23 issue as relevant to amending complaint (3   |                           | 952.00           | VTC       |
|            | Avoidance Action Litigation; Research<br>American Pipe issue as relevant to amenda<br>complaint (3900)  | 1.00                      | 595.00           | VTC       |
|            | Avoidance Action Litigation; Continued drafting of Motion to Amend Amended Complaint (3900)   | 6.80                      | 3,060.00         | AMB       |
|            | Avoidance Action Litigation; O/c w/AHC Motion to Amend and service of discovery various entities (0200)   |                           | 180.00           | AMB       |
|            | Avoidance Action Litigation; Review ema<br>from AHC to P. Andersen re: confirming<br>addresses of potential foreign defendants (  |                           | 45.00            | AMB       |
|            | Avoidance Action Litigation; Emails to/fre Clareman from Citibank re: follow-up que re: subpoena seeking information re: distributions (3900)   |                           | 90.00            | AMB       |
|            | Avoidance Action Litigation; T/c w/J. Por Clear Ridge re: question re: subpoena seek  |                           | 45.00            | AMB       |
|            | information re: distributions (3900) Avoidance Action Litigation; Draft subpose and accompanying cover letter, schedules exhibits to potential defendant, Putnam Structured Product CDO 2003-1 Ltd. (390) | and                       | 150.00           | MAF       |
|            | Avoidance Action Litigation; Draft subpose and accompanying cover letter, schedules   | ena 0.60                  | 150.00           | MAF       |

and accompanying cover letter, schedules and

| Invoice #: 08-13555 mg | Doc 27994-4                             | Filed 05/21/12 Entered 05/21/12 18:33:27<br>Pg 28 of 70 | Exhibit D | March |
|------------------------|---|---|-----------|-------|
|                        | o potential defenda<br>d Product CDO 20 |   |           |       |

| 1 9 20 01 70   |      |          |     |
|--|------|----------|-----|
| exhibits to potential defendant, Putnam<br>Structured Product CDO 2003-1 Ltd. (3900)<br>Avoidance Action Litigation; Review S.<br>Collings' email re: Crown City 2005-1 as being<br>dismissed from adversary proceeding (0200) | 0.10 | 27.50    | АНС |
| Avoidance Action Litigation; Review memoranda to compile list of all noteholders and potential noteholders who owned securities in Group City 2005, 1 (2000)   | 0.40 | 110.00   | АНС |
| in Crown City 2005-1 (3900) Avoidance Action Litigation; Review correspondence from J. Garrity, counsel for Royal Bancshares of PA (3900)  | 0.10 | 27.50    | АНС |
| Avoidance Action Litigation; Draft subpoena to<br>Royal Bancshares of PA (3900)  | 0.30 | 82.50    | AHC |
| Avoidance Action Litigation; O/cs w/MF resubpoena to US Bank as Trustee for Putnam Investments (0200)  | 0.10 | 27.50    | AHC |
| Avoidance Action Litigation; Draft cover email to J. Garrity, counsel for Royal Bancshares of PA seeking acceptance of subpoena addressed to Royal Bancshares (3900)   | 0.10 | 27.50    | АНС |
| Avoidance Action Litigation; Meeting w/AMB re: outstanding issues including motion to extend stay and motion to amend, follow up with P. Anderson of LLS (0200)  | 0.40 | 110.00   | АНС |
| Avoidance Action Litigation; T/c w/W.<br>Clareman, counsel for Citibank, N.A. and<br>AMB re: follow up information from Citibank,<br>N.A. (3900)   | 0.10 | 27.50    | АНС |
| Avoidance Action Litigation; Emails to/from ADR re: affidavit of service of process for Credit Agricole (f/k/a Calyon) (0200)  | 0.10 | 27.50    | АНС |
| Avoidance Action Litigation; Update LBSF's portion of brief for motion to extend stay (3900)   | 0.60 | 165.00   | АНС |
| Avoidance Action Litigation; Review P.<br>Anderson's emails with additional verified<br>addresses for entities such as Geometric<br>Funding (3900)   | 0.20 | 55.00    | АНС |
| Avoidance Action Litigation; Draft schedule for noteholders to be attached to amended complaint (3900)   | 4.40 | 1,210.00 | АНС |
| Avoidance Action Litigation; File Affidavit of Service of First Amended Summons and First Amended Complaint for Credit Agricole Corporate and Investment Bank (f/k/a Calyon) on PACER for AMB and AHC (3900)                   | 0.20 | 23.00    | ADR |
| Avoidance Action Litigation; Review docs redistributions on Pebble Creek 2007-2 Class E Notes (3900)   | 0.20 | 119.00   | SCB |

Dec-06-11

| 9   |      |          |     |
|---|------|----------|-----|
| Avoidance Action Litigation; Further research on section 550 issue re: amending complaint   | 2.90 | 1,725.50 | VTC |
| Avoidance Action Litigation; O/c w/AMB,<br>AHC re: status of service, motion to extend,<br>notice letters and dismissal (0200)  | 0.30 | 178.50   | WFD |
| Avoidance Action Litigation: T/c w/ M.Breen re: Whitehawk CDO and request for additional time to respond to subpoena seeking information re: distributions (3900)   | 0.20 | 90.00    | AMB |
| Avoidance Action Litigation: Review and revise insert in Stay Motion per L. Goldberg's request (3900)   | 1.20 | 540.00   | AMB |
| Avoidance Action Litigation: Email to J. Lewis, counsel for the Royal Bank of Pennsylvania, re: request to accept service of process of subpoena (3900)   | 0.10 | 45.00    | AMB |
| Avoidance Action Litigation: Review and finalize foreign discovery letter to Geometric Asset Funding Ltd. seeking information re: distributions (3900)  | 0.10 | 45.00    | AMB |
| Avoidance Action Litigation: Review and finalize foreign discovery letter to Tierra Alta Funding I, Ltd. seeking information re: distributions (3900)   | 0.10 | 45.00    | AMB |
| Avoidance Action Litigation: Review and finalize subpoena for Terwin Capital, LLC seeking information re: distributions (3900)  | 0.20 | 90.00    | AMB |
| Avoidance Action Litigation: Review and finalize subpoena for Putnam Structured Product CDO 2002-1 Ltd seeking information re: distributions (3900)   | 0.20 | 90.00    | AMB |
| Avoidance Action Litigation: Review and finalize subpoena for Putnam Structured Product CDO 2003-1 Ltd seeking information re: distributions (3900)   | 0.10 | 45.00    | AMB |
| Avoidance Action Litigation: Continue drafting and revising motion to amend amended complaint to incorporate all recent legal research (3900)   | 5.70 | 2,565.00 | AMB |
| Avoidance Action Litigation: O/c w/ AHC And WFD re: next steps for motion to amend complaint (0200)   | 0.30 | 135.00   | AMB |
| Avoidance Action Litigation: Draft subpoena to potential noteholder Terwin Capital, LLC and accompanying documents to be served on the NY Department of State, including cover letter and exhibits (3900) | 1.20 | 300.00   | MAF |
| Avoidance Action Litigation: Draft foreign discovery request to potential noteholder Geometric Asset Funding Ltd. (3900)  | 0.40 | 100.00   | MAF |

| Invoice #: 08-13555-mg Doc 27994-4 Filed 05/21/12 E   | intered 05 | /21/12 18:33:27 | Exhibit D |
|---|------------|-----------------|-----------|
| Avoidance Action Litigation: Draft foreign discovery request to potential noteholder Tierra Alta Funding I, Ltd (3900)  | 0.30       | 75.00           | MAF       |
| Avoidance Action Litigation: Draft foreign discovery request to potential noteholder Beryl Finance Ltd. Series 2007-17 (3900)   | 0.40       | 100.00          | MAF       |
| Avoidance Action Litigation: Draft foreign discovery request to potential noteholder Beryl Finance Ltd. Series 2007-18 (3900)   | 0.30       | 75.00           | MAF       |
| Avoidance Action Litigation: Draft foreign discovery request to potential noteholder Big Horn CDO 2007-1 Collateral (3900)  | 0.30       | 75.00           | MAF       |
| Avoidance Action Litigation; Complete first draft of schedule 2 to amended complaint (3900)   | 2.60       | 715.00          | AHC       |
| Avoidance Action Litigation; O/cs w/MF re: subpoena to Dep't of State on behalf of Terwin Capital (0200)  | 0.10       | 27.50           | АНС       |
| Avoidance Action Litigation; Review and revise discovery letters to Tierra Alta Funding and Geometric Asset Funding (3900)  | 0.40       | 110.00          | АНС       |
| Avoidance Action Litigation; Review and revise subpoena to Dep't of State on behalf of Terwin Capital (3900)  | 0.10       | 27.50           | АНС       |
| Avoidance Action Litigation; Emails to P. Anderson re: obtaining addresses for additional potential noteholders including SBC Master Pension Trust (3900)   | 0.10       | 27.50           | AHC       |
| Avoidance Action Litigation; Review and revise draft insert to stay motion (3900)   | 0.40       | 110.00          | AHC       |
| Avoidance Action Litigation; Review email from C. LaForge of LLS re: bid letter required for obtaining Cayman addresses (3900)  | 0.10       | 27.50           | AHC       |
| Avoidance Action Litigation; Review bankruptcy rules re: dismissal of party from adversary proceeding (3900)  | 0.70       | 192.50          | AHC       |
| Avoidance Action Litigation; O/c w/AMB, JEL re: dismissal of party from adversary proceeding (0200)   | 0.10       | 27.50           | AHC       |
| Avoidance Action Litigation; Review SCB email re: distributions to Pebble Creek 2007-2 Class E noteholders (0200)   | 0.20       | 55.00           | AHC       |
| Avoidance Action Litigation; O/cs w/MF reservice of subpoena to F. Top, counsel for US  Bank (0200)   | 0.10       | 27.50           | АНС       |
| Avoidance Action Litigation; Review memoranda summarizing discovery to determine how to proceed with entities who are holders of Crown City 2005-1, as the issuer is being dropped from the adversary proceeding (3900) | 0.60       | 165.00          | АНС       |

| 08-13555-mg Doc 27994-4 Filed 05/21/12 E  | ntered 05 | /21/12 18:33:27 | Exhibit D |
|---|-----------|-----------------|-----------|
| Avoidance Action Litigation; Email to ADR re: re-filing of affidavit of service of process on   | 0.10      | 27.50           | AHC       |
| Calyon due to missing documentation (0200) Avoidance Action Litigation; O/c w/MSF re: filing of affidavit of service of process on Calyon (0200)  | 0.10      | 27.50           | AHC       |
| Avoidance Action Litigation; Draft stipulation between LBSF, Crown City 2005-1, Credit Agricole and Wells Fargo (3900)  | 0.90      | 247.50          | AHC       |
| Avoidance Action Litigation; Review foreign discovery letters to Beryl Finance and Big Horn CDP 2007-1 (3900)   | 0.30      | 82.50           | AHC       |
| Avoidance Action Litigation; Perform research<br>on registered agent of Ohio Public Employees<br>Retirement System (3900)   | 0.30      | 82.50           | AHC       |
| Avoidance Action Litigation; Draft follow up email to I. deVyver re: BNYM's distributions to NYC Housing Development Corp (3900)  | 0.20      | 55.00           | АНС       |
| Avoidance Action Litigation; Meeting w/WFD, AMB re: open issues such as Pyxis Class D, E, F noteholders, translations for foreign discovery letters, issues with motion to amend (0200) | 0.30      | 82.50           | АНС       |
| Avoidance Action Litigation; O/c w/AMB re: obtaining information needed for motion to amend such as dates of service of subpoenas, time frames for such service (0200)                  | 0.10      | 27.50           | АНС       |
| Avoidance Action Litigation; Review and research discovery related to information needed for motion to amend (3900)   | 1.40      | 385.00          | АНС       |
| Avoidance Action Litigation; Determine the countries needed for translations of documents for service of notice of naming in amended complaint (3900)                                   | 0.60      | 165.00          | AHC       |
| Avoidance Action Litigation; Draft memoranda summarizing unknown addresses of foreign potential noteholders (3900)  | 0.20      | 55.00           | AHC       |
| Avoidance Action Litigation; Draft exhibits of transactions for KLIO II Funding and KLIO III Funding (3900)   | 0.40      | 110.00          | АНС       |
| Avoidance Action Litigation; Draft and revise amended affidavit of service (3900)   | 0.20      | 23.00           | MSF       |
| Avoidance Action Litigation; Compile and organize notice and subpoena for service upon Terwin Capital by DLS for MAF (3900)   | 0.60      | 69.00           | HK        |
| Avoidance Action Litigation; Compile transmittal letters and discovery requests to be sent to Geometric Asset Funding and Tierra  | 0.30      | 34.50           | НК        |

Alta Funding for MAF (3900)

| Invoice #: | 3555-mg Doc 27994-4 Filed 05/21/12 F<br>Pg 32 of 70   | Entered 05 | /21/12 18:33:27 | Exhibit D |
|------------|---|------------|-----------------|-----------|
| Dec-07-11  | Avoidance Action Litigation; Additional research of section 550 issues relevant to motion to amend complaint (3900)   | 2.10       | 1,249.50        | VTC       |
|            | Avoidance Action Litigation; Review and revise draft for motion to amend (3900)   | 0.90       | 535.50          | VTC       |
|            | Avoidance Action Litigation; Draft and revise sections of the working draft of the motion to amend the amended complaint to add numerous (hundreds) of additional defendants and correct the names of other defendants regarding alternative argument that claims are recoverable and timely under Section 550(f) of the Bankruptcy Code (3900) | 10.30      | 4,635.00        | AMB       |
|            | Avoidance Action Litigation; Review and finalize foreign discovery letter seeking information re: distributions to KLIO III Funding Corp (3900)   | 0.10       | 45.00           | AMB       |
|            | Avoidance Action Litigation; Review and finalize foreign discovery letter seeking information re: distributions to Beryl Finance Limited (3900)   | 0.20       | 90.00           | AMB       |
|            | Avoidance Action Litigation; Review and finalize foreign discovery letter seeking information re: distributions to KLIO III Funding Corp (3900)   | 0.10       | 45.00           | AMB       |
|            | Avoidance Action Litigation; Review and finalize foreign discovery letter seeking information re: distributions to KLIO II Funding Corp (3900)  | 0.10       | 45.00           | AMB       |
|            | Avoidance Action Litigation; Emails to/from J. Garrity counsel for Royal Bank re: request to accept service of process of a subpoena seeking info re: distributions (3900)  | 0.10       | 45.00           | AMB       |
|            | Avoidance Action Litigation; Review email from V. Farron re: proof of service upon Omnicron in Austria (3900)   | 0.10       | 45.00           | AMB       |
|            | Avoidance Action Litigation; Review email from AHC to WFD re: Letter Providing Notice and Translations from LLS (0200)  | 0.10       | 45.00           | AMB       |
|            | Avoidance Action Litigation; Email to/from S. Collings re: creating list of Settled/ADR deals (3900)  | 0.60       | 270.00          | AMB       |
|            | Avoidance Action Litigation; Email to/from I. DViver re: request for additional information re: BNY supplemental production in response to subpoena seeking information re: distributions (3900)  | 0.20       | 90.00           | AMB       |
|            | Avoidance Action Litigation O/c w/PRW re: additional addresses for potential noteholders defendants(3900)   | 0.20       | 90.00           | AMB       |

| Py 33 01 70   |      |          |     |
|---|------|----------|-----|
| Avoidance Action Litigation; Research and cite check cases to be cited in motion to amend (3900)  | 2.80 | 770.00   | FWS |
| Avoidance Action Litigation; Research and case check for motion to amend re. American Pipe  | 0.60 | 165.00   | FWS |
| (3900) Avoidance Action Litigation: Research duty of mortgagee to mitigate damages by making a  | 4.20 | 1,050.00 | MAF |
| title insurance claim (3900) Avoidance Action Litigation: Draft discovery request to potential noteholder defendant, KLIO                       | 0.40 | 100.00   | MAF |
| II Funding Corp. (3900) Avoidance Action Litigation: Draft discovery request to potential noteholder defendant, KLIO                            | 0.40 | 100.00   | MAF |
| III Funding Corp. (3900) Avoidance Action Litigation: Follow up on status of serving Terwin Capital with subpoena                               | 0.10 | 25.00    | MAF |
| (3900) Avoidance Action Litigation; Review Safety National's responses to LBSF's subpoena (3900)  | 0.30 | 82.50    | AHC |
| Avoidance Action Litigation; Draft follow up email to S. Bonnet, counsel for Safety National (3900)   | 0.20 | 55.00    | AHC |
| Avoidance Action Litigation; Research additional information re: properly named defendants to be inserted into motion to amend complaint (3900) | 0.90 | 247.50   | АНС |
| Avoidance Action Litigation; Review Reliance<br>Standard Life Insurance Company's responses<br>to LBSF's subpoena (3900)                        | 0.30 | 82.50    | AHC |
| Avoidance Action Litigation; Draft follow up email to S. Bonnet, counsel for Reliance Standard (3900)   | 0.20 | 55.00    | AHC |
| Avoidance Action Litigation; Draft letter to all potential noteholders providing notice of LBSF's motion to amend (3900)                        | 0.40 | 110.00   | АНС |
| Avoidance Action Litigation; Review foreign discovery packages to be sent to KLIO II Funding and KLIO III Funding (3900)                        | 0.30 | 82.50    | АНС |
| Avoidance Action Litigation; Email to WFD re: translations required from LLS (0200)   | 0.10 | 27.50    | AHC |
| Avoidance Action Litigation; Review and revise LBSF's insert into stay motion (3900)  | 0.30 | 82.50    | AHC |
| Avoidance Action Litigation; Review and revise memoranda summarizing potential noteholders for amended complaint (3900)                         | 0.20 | 55.00    | АНС |
| Avoidance Action Litigation; T/cs w/R. Kaye, clerk for Judge Peck re: missing proof of service upon Omicron Investment Management (3900)        | 0.20 | 55.00    | АНС |

| 08-13!<br>Invoice #: | 555 <sub>-</sub> mg<br>22186     | Doc 27994-4   | Filed 05/21/12<br>Pg <sup>3</sup> \$4 of 76                    | Entered 05 <i>i</i> | /21/12 18:33:27 | Exhibit |
|----------------------|----------------------------------|---|--|---------------------|-----------------|---------|
|                      | office at b                      |   | n; T/c w/Clerk's<br>e: missing proof of<br>stment Management   | 0.10                | 27.50           | АНС     |
|                      | Avoidance<br>summariz            | e Action Litigation ing document produce Standard Life  |  | 0.40                | 110.00          | AHC     |
|                      | summariz                         | e Action Litigation ing document protey National (3900) |  | 0.40                | 110.00          | АНС     |
|                      | memorano<br>potential r          | y Safety National                                       | s received by ect new information                              | 0.40                | 110.00          | АНС     |
|                      | Avoidance                        | e Action Litigatio ow up email to S.                    | n; Review and<br>Bonnet re: Safety                             | 0.10                | 27.50           | AHC     |
|                      | Avoidance                        | e Action Litigation<br>L in support of m                |  | 2.60                | 715.00          | AHC     |
|                      | Àvoidance                        | to brief in suppor                                      | n; O/c w/AMB re:<br>rt of motion to                            | 0.10                | 27.50           | AHC     |
|                      | Avoidance to obtain a defendants | e Action Litigation dditional informa                   | ed addresses such  | 0.70                | 192.50          | АНС     |
|                      | Port, coun                       |   | n; Draft email to J.<br>aring following up<br>re: Pebble Creek | 0.20                | 55.00           | AHC     |
|                      | Àvoidance                        | ounsel for Blue H                                       | n; Review fax from<br>eron Funding II                          | 0.20                | 55.00           | AHC     |
|                      | Avoidance<br>summarizi           |   | n; Draft memoranda<br>vived from Blue                          | 0.20                | 55.00           | AHC     |
|                      |                                  | Action Litigation                                       | n; Revise doc  | 0.20                | 23.00           | MSF     |
| -<br>-               | numbers o                        | Action Litigation f does cited in briamend (3900)       | n; Search for docket<br>lef in support of                      | 0.30                | 34.50           | ADR     |
| Dec-08-11            | Avoidance                        | Action Litigation on draft brief in su                  | n; Review and apport of motion to                              | 3.60                | 2,142.00        | VTC     |

Dec-08-11

amend (3900)

| 08-13555-mg Doc 27994-4 Filed 05/21/12 Envoice #: 22186 Pgass of 70  | Intered 05 | /21/12 18:33:27 | Exhibit D |
|--|------------|-----------------|-----------|
| Avoidance Action Litigation; O/cs and emails to AMB re: brief on support of motion to amend (3900)   | 0.20       | 119.00          | VTC       |
| Avoidance Action Litigation; Review email from I. DeViver re: will follow-up re: request for additional information re: subpoena on BNY seeking information re: distributions (3900)                 | 0.10       | 45.00           | AMB       |
| Avoidance Action Litigation; O/c w/MF re: prep of list to be sent to J. Brizuela re: deals that have settled (3900)  | 0.10       | 45.00           | AMB       |
| Avoidance Action Litigation; Revise cover letter to Court re: Motion to Extend Time to Serve process (3900)  | 0.20       | 90.00           | AMB       |
| Avoidance Action Litigation; O/c w/ADR re: providing courtesy copy of Motion to Extend Time to Serve to Court (3900)   | 0.10       | 45.00           | AMB       |
| Avoidance Action Litigation; Review chart resettled, dismissed and ADR deals (3900)  | 0.20       | 90.00           | AMB       |
| Avoidance Action Litigation: review email from B. Lanaghan, counsel for Structure Credit America re: production of docs in response to subpoena seeking information re: distributions (3900)         | 0.10       | 45.00           | AMB       |
| Avoidance Action Litigation; Email to/from S. Bonnet from Reliance Standard Life re: follow-up question w/r/t production made in response to subpoena seeking information re: distributions (3900)   | 0.20       | 90.00           | AMB       |
| Avoidance Action Litigation; Email to/from S. Bonnet from Safety National Casualty re: follow-up question w/r/t production made in response to subpoena seeking information re: distributions (3900) | 0.20       | 90.00           | AMB       |
| Avoidance Action Litigation; Email to J. Port re: Ridge Clearing re: request for additional information re: distributions (3900)   | 0.30       | 135.00          | AMB       |
| Avoidance Action Litigation; Review emails from PW and AHC re: addresses for SCB Master Trust to serve subpoena seeking information re: distributions (3900)   | 0.10       | 45.00           | AMB       |
| Avoidance Action Litigation; Email to/from J.  Marcus re: Motion to Extend Time to Stay  Avoidance Action (3900)   | 0.10       | 45.00           | AMB       |
| Avoidance Action (3500)  Avoidance Action Litigation; Revise Motion to   | 1.90       | 855.00          | AMB       |

45.00

**AMB** 

0.10

Amend Amended Complaint (3900)

defendants (3900)

Avoidance Action Litigation; Email to/from P.

Andersen re: research re: location for foreign

| . 9 00 0 0  |      |        |     |
|---|------|--------|-----|
| Avoidance Action Litigation: Review email from AHC to LLS re: request to confirm addresses for OSDF Ltd., Peregrine Strategies                                      | 0.10 | 45.00  | AMB |
| Two Ltd., Sterling Strategies Ltd (3900)<br>Avoidance Action Litigation: T/c w/M. Moshe<br>from Venable re: additional information re:<br>CUSIP number (C11) (0.2); | 0.20 | 90.00  | AMB |
| Avoidance Action Litigation; Research service issues for SBC Master Pension Trust and PPL Services Corporation Master Trust (3900)                                  | 0.90 | 292.50 | PRW |
| Avoidance Action Litigation: Review affidavits of service to update status of list of potential defendants to be named in an amended complaint (3900)               | 0.60 | 150.00 | MAF |
| Avoidance Action Litigation: Draft subpoena and accompanying exhibits, cover letter and notice of subpoena to potential defendant SBC Master Pension Trust. (3900)  | 1.20 | 300.00 | MAF |
| Avoidance Action Litigation: Revise discovery request to potential noteholder defendant Big Horn CDO 2007-1 (3900)  | 0.10 | 25.00  | MAF |
| Avoidance Action Litigation; Emails to/from AMB re: courtesy copy of motion to extend time to serve to Judge Peck's chambers (0200)                                 | 0.10 | 27.50  | AHC |
| Avoidance Action Litigation; Review and revise brief in support of motion to amend (3900)   | 0.40 | 110.00 | AHC |
| Avoidance Action Litigation; T/c w/ADR re: courtesy copy to Judge Peck's chambers and certificate of no opposition (0200)   | 0.10 | 27.50  | AHC |
| Avoidance Action Litigation; Review email from P. Anderson re: Cayman Islands search (3900)   | 0.10 | 27.50  | AHC |
| Avoidance Action Litigation; Draft certificate of no objection to motion to extend time to serve process (3900)   | 0.40 | 110.00 | АНС |
| Avoidance Action Litigation; Review and revise cover letter to Judge Peck enclosing certificate of no objection and revised proposed order (3900)                   | 0.20 | 55.00  | АНС |
| Avoidance Action Litigation; Review information pulled from PRW re: principal place of business for SBC Master Pension Trust (3900)                                 | 0.10 | 27.50  | АНС |
| Avoidance Action Litigation; Review correspondence from G. Copeland, counsel for Sun Life Assurance Company of Canada (3900)  | 0.10 | 27.50  | AHC |
| Avoidance Action Litigation; Review and revise certificate of no objection per AMB comments (3900)  | 0.30 | 82.50  | АНС |

| Invoice   | 08-13555-mg Doc 27994-4 Filed 05/21/12 F<br>#: Pg <sup>a</sup> s7 of 70   | Entered 0! | 5/21/12 18:33:27 | Exhibit D |
|-----------|---|------------|------------------|-----------|
|           | Avoidance Action Litigation; Send follow up<br>email to P. Anderson re: confirmation of<br>addresses provided for service of foreign<br>discovery letters (3900)  | 0.10       | 27.50            | АНС       |
|           | Avoidance Action Litigation; Review document production produced by Terry and Bonnie Burman (3900)  | 2.10       | 577.50           | AHC       |
|           | Avoidance Action Litigation; Draft memoranda summarizing document production produced by Terry and Bonnie Burman (3900)   | 0.60       | 165.00           | АНС       |
|           | Avoidance Action Litigation; Update<br>memoranda summarizing distributions received<br>by potential noteholders to reflect information<br>from Bonnie and Terry Burman (3900  | 0.40       | 110.00           | АНС       |
|           | Avoidance Action Litigation; Draft chart of issuers in avoidance action for AMB(3900)   | 0.60       | 69.00            | MSF       |
|           | Avoidance Action Litigation; Compile and prepare cover letters, copies of Amended Complaint and Order re: expedited discovery to be sent to KLIO II Funding Corp, KLIO III Funding Corp, Beryl Finance Limited Series 2007-17 and Beryl Finance Limited Series 2007-18 for MAF (3900) | 0.80       | 92.00            | НК        |
|           | Avoidance Action Litigation; Draft cover letter to Judge Peck re: courtesy copies of Motion to Extend Service and prepare courtesy copies of Notice of Motion, Motion to Extend Service, and Certificate of No Objection for AMB (3900)   | 1.90       | 218.50           | ADR       |
|           | Avoidance Action Litigation; E-file Certificate of No Objection for Motion to Extend for AHC (3900)   | 0.20       | 23.00            | ADR       |
| Dec-09-11 | Avoidance Action Litigation; Further research for and comment on brief for motion to amend complaint (3900)   | 3.50       | 2,082.50         | VTC       |
|           | Avoidance Action Litigation; Draft and revise sections of the working draft of the motion to amend the amended complaint to add numerous (hundreds) of additional defendants and correct the names of other defendants regarding futility prong of FRCP 15(a) (3900)                  | 6.60       | 2,970.00         | AMB       |
|           | Avoidance Action Litigation; Review email from F. Top re: issuing a subpoena to Montrose Harbor CDO I (3900)  | 0.10       | 45.00            | AMB       |
|           | Avoidance Action Litigation: Case check for motion to amend complaint (3900)  | 0.20       | 55.00            | FWS       |
|           | Avoidance Action Litigation: Create a list of the number of subpoenas and foreign   | 0.80       | 200.00           | MAF       |

| request to potential foreign noteholder defendant Peregrine Strategies Two Ltd. (3900)  Avoidance Action Litigation: Draft discovery request to potential foreign noteholder defendant Starling Strategies Ltd. (3900)  Avoidance Action Litigation: Draft discovery 0.40 100.00 Movidance Action Litigation: Draft discovery 0.40 100.00 Movidance Action Litigation: Draft discovery 0.40 100.00 Movidance Action Litigation: T/c w/clerk for 0.20 55.00 Actematical Commence of Service for Omicron Investment Management (3900)  Avoidance Action Litigation; T/c w/R. Kaye, 0.20 55.00 Acterk for Judge Peck's chambers re: motion to extend service of process (3900)  Avoidance Action Litigation; O/c w/AMB re: 0.20 55.00 Acterk for Under Process (3900)  Avoidance Action Litigation; T/c w/M. Moche from Venable, counsel for Gatex re: CUSIP numbers (3900)  Avoidance Action Litigation; Review 0.20 55.00 Acter Movidance Action Litigation; Review 0.20 55.00 Acter Proper name for OSDF Ltd. for purposes of service of subpoena pursuant to federal rules (0200)  Avoidance Action Litigation; Review 0.70 192.50 Acter Proper name for OSDF Ltd. for purposes of service of subpoena pursuant to federal rules (0200)  Avoidance Action Litigation; Review 0.70 192.50 Acter Movidance Action Litigation; Review 0.70 192.50 Acter Movidance Action Litigation; O/cs w/MAF re: 0.20 55.00 Acter Movidance Action Litigation; O/cs w/MAF re: 0.20 55.00 Acter Movidance Action Litigation; O/cs w/MAF re: 0.20 55.00 Acter Movidance Action Litigation; O/ | . g  |      |        |     |
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| request to potential foreign noteholder defendant Peregrine Strategies Two Ltd. (3900)  Avoidance Action Litigation: Draft discovery request to potential foreign noteholder defendant Starling Strategies Ltd. (3900)  Avoidance Action Litigation: Draft discovery 0.40 100.00 Mover request to potential foreign noteholder defendant OSDF Ltd. (3900)  Avoidance Action Litigation; T/c w/clerk for 0.20 55.00 A Lehman case re: proof of service for Omicron Investment Management (3900)  Avoidance Action Litigation; T/c w/R. Kaye, 0.20 55.00 A Clerk for Judge Peck's chambers re: motion to extend service of process (3900)  Avoidance Action Litigation; O/c w/AMB re: 0.20 55.00 A Calls w/clerk re: proof of service and R. Kaye re: motion to extend (0200)  Avoidance Action Litigation; T/c w/M. Moche from Venable, counsel for Gatex re: CUSIP numbers (3900)  Avoidance Action Litigation; Review 0.20 55.00 A County of the more of the promote of | number of countries to which we have sent<br>discovery requests to insert in motion to amend<br>the amended complaint (3900)                   | 0.40 | 100.00 | MAF |
| request to potential foreign noteholder defendant Starling Strategies Ltd. (3900) Avoidance Action Litigation: Draft discovery request to potential foreign noteholder defendant OSDF Ltd. (3900) Avoidance Action Litigation; T/c w/clerk for Lehman case re: proof of service for Omicron Investment Management (3900) Avoidance Action Litigation; T/c w/R. Kaye, 0.20 55.00 A clerk for Judge Peck's chambers re: motion to extend service of process (3900) Avoidance Action Litigation; O/c w/AMB re: 0.20 55.00 A calls w/clerk re: proof of service and R. Kaye re: motion to extend (0200) Avoidance Action Litigation; T/c w/M. Moche from Venable, counsel for Gatex re: CUSIP numbers (3900) Avoidance Action Litigation; Review 0.20 55.00 A correspondence from S. Sullivan re: confirmed addresses for OSDF and Peregrine Strategies Two (3900) Avoidance Action Litigation; Review 0.20 55.00 A correspondence from S. Sullivan re: confirmed addresses for OSDF and Peregrine Strategies Two (3900) Avoidance Action Litigation; Cycs w/MAF re: 0.10 27.50 A proper name for OSDF Ltd. for purposes of service of subpoena pursuant to federal rules (0200) Avoidance Action Litigation; Review 0.70 192.50 A memoranda summarizing discovery re: OSDF Ltd. and OSDF Equity AC (3900) Avoidance Action Litigation; Review 0.70 192.50 A memoranda summarizing discovery re: OSDF Ltd. and OSDF Equity AC (3900) Avoidance Action Litigation; O/cs w/MAF re: 0.20 55.00 A foreign discovery to be sent to OSDF and Peregrine Strategies (0200) Avoidance Action Litigation; O/cs w/MAF re: 0.20 55.00 A foreign discovery to be sent to OSDF and Peregrine Strategies (0200) Avoidance Action Litigation; O/cs w/MAF re: 0.20 55.00 A foreign discovery to be sent to OSDF and Peregrine Strategies (0200) Avoidance Action Litigation; O/cs w/AMB re: 0.20 55.00 A foreign discovery to be sent to OSDF and Peregrine Strategies (0200)   | request to potential foreign noteholder  | •••• | 100.00 |     |
| request to potential foreign noteholder defendant OSDF Ltd. (3900) Avoidance Action Litigation; T/c w/clerk for Lchman case re: proof of service for Omicron Investment Management (3900) Avoidance Action Litigation; T/c w/R. Kaye, clerk for Judge Peck's chambers re: motion to extend service of process (3900) Avoidance Action Litigation; O/c w/AMB re: calls w/clerk re: proof of service and R. Kaye re: motion to extend (0200) Avoidance Action Litigation; T/c w/M. Moche from Venable, counsel for Gatex re: CUSIP numbers (3900) Avoidance Action Litigation; Review 0.20 55.00 A memoranda summarizing potential noteholders re: Shield Securities to determine whether they will be included in amended complaint (3900) Avoidance Action Litigation; Review 0.20 55.00 A correspondence from S. Sullivan re: confirmed addresses for OSDF and Peregrine Strategies Two (3900) Avoidance Action Litigation; Email to MAF re: 0.10 27.50 A outstanding foreign discovery letters (0200)  Avoidance Action Litigation; O/cs w/MAF re: 0.10 27.50 A proper name for OSDF Ltd. for purposes of service of subpoena pursuant to federal rules (0200) Avoidance Action Litigation; Review 0.70 192.50 A memoranda summarizing discovery re: OSDF Ltd. and OSDF Equity AC (3900) Avoidance Action Litigation; O/cs w/MAF re: 0.20 55.00 A memoranda summarizing discovery re: OSDF Ltd. and OSDF Equity AC (3900) Avoidance Action Litigation; O/cs w/MAF re: 0.20 55.00 A foreign discovery to be sent to OSDF and Peregrine Strategies (0200) Avoidance Action Litigation; O/c w/AMB re: 0.20 55.00 A calls to court and follow up with J. Brizuela of   | request to potential foreign noteholder  | 0.30 | 75.00  | MAF |
| Lehman case re: proof of service for Omicron Investment Management (3900) Avoidance Action Litigation; T/c w/R. Kaye, clerk for Judge Peck's chambers re: motion to extend service of process (3900) Avoidance Action Litigation; O/c w/AMB re: 0.20 55.00 A calls w/clerk re: proof of service and R. Kaye re: motion to extend (0200) Avoidance Action Litigation; T/c w/M. Moche from Venable, counsel for Gatex re: CUSIP numbers (3900) Avoidance Action Litigation; Review 0.20 55.00 A memoranda summarizing potential noteholders re: Shield Securities to determine whether they will be included in amended complaint (3900) Avoidance Action Litigation; Review 0.20 55.00 A correspondence from S. Sullivan re: confirmed addresses for OSDF and Peregrine Strategies Two (3900) Avoidance Action Litigation; Email to MAF re: 0.10 27.50 A outstanding foreign discovery letters (0200)  Avoidance Action Litigation; O/cs w/MAF re: 0.10 27.50 A proper name for OSDF Ltd. for purposes of service of subpoena pursuant to federal rules (0200) Avoidance Action Litigation; Review 0.70 192.50 A memoranda summarizing discovery re: OSDF Ltd. and OSDF Equity AC (3900) Avoidance Action Litigation; O/cs w/MAF re: 0.20 55.00 A foreign discovery to be sent to OSDF and Peregrine Strategies (0200) Avoidance Action Litigation; O/c w/AMB re: 0.20 55.00 A calls to court and follow up with J. Brizuela of   | request to potential foreign noteholder  | 0.40 | 100.00 | MAF |
| clerk for Judge Peck's chambers re: motion to extend service of process (3900)  Avoidance Action Litigation; O/c w/AMB re: 0.20 55.00 A calls w/clerk re: proof of service and R. Kaye re: motion to extend (0200)  Avoidance Action Litigation; T/c w/M. Moche from Venable, counsel for Gatex re: CUSIP numbers (3900)  Avoidance Action Litigation; Review 0.20 55.00 A memoranda summarizing potential noteholders re: Shield Securities to determine whether they will be included in amended complaint (3900)  Avoidance Action Litigation; Review 0.20 55.00 A correspondence from S. Sullivan re: confirmed addresses for OSDF and Peregrine Strategies  Two (3900)  Avoidance Action Litigation; Email to MAF re: 0.10 27.50 A outstanding foreign discovery letters (0200)  Avoidance Action Litigation; O/cs w/MAF re: 0.10 27.50 A proper name for OSDF Ltd. for purposes of service of subpoena pursuant to federal rules (0200)  Avoidance Action Litigation; Review 0.70 192.50 A memoranda summarizing discovery re: OSDF Ltd. and OSDF Equity AC (3900)  Avoidance Action Litigation; O/cs w/MAF re: 0.20 55.00 A foreign discovery to be sent to OSDF and Peregrine Strategies (0200)  Avoidance Action Litigation; O/cs w/MAB re: 0.20 55.00 A calls to court and follow up with J. Brizuela of   | Lehman case re: proof of service for Omicron Investment Management (3900)  | 0.20 | 55.00  | АНС |
| calls w/clerk re: proof of service and R. Kaye re: motion to extend (0200) Avoidance Action Litigation; T/c w/M. Moche from Venable, counsel for Gatex re: CUSIP numbers (3900) Avoidance Action Litigation; Review nemoranda summarizing potential noteholders re: Shield Securities to determine whether they will be included in amended complaint (3900) Avoidance Action Litigation; Review correspondence from S. Sullivan re: confirmed addresses for OSDF and Peregrine Strategies Two (3900) Avoidance Action Litigation; Email to MAF re: outstanding foreign discovery letters (0200)  Avoidance Action Litigation; O/cs w/MAF re: proper name for OSDF Ltd. for purposes of service of subpoena pursuant to federal rules (0200) Avoidance Action Litigation; Review nemoranda summarizing discovery re: OSDF Ltd. and OSDF Equity AC (3900) Avoidance Action Litigation; O/cs w/MAF re: foreign discovery to be sent to OSDF and Peregrine Strategies (0200) Avoidance Action Litigation; O/cs w/MAB re: olion 27.50 A Calls to court and follow up with J. Brizuela of   | clerk for Judge Peck's chambers re: motion to extend service of process (3900)   |      |        | AHC |
| from Venable, counsel for Gatex re: CUSIP numbers (3900)  Avoidance Action Litigation; Review 0.20 55.00 A memoranda summarizing potential noteholders re: Shield Securities to determine whether they will be included in amended complaint (3900)  Avoidance Action Litigation; Review 0.20 55.00 A correspondence from S. Sullivan re: confirmed addresses for OSDF and Peregrine Strategies  Two (3900)  Avoidance Action Litigation; Email to MAF re: 0.10 27.50 A outstanding foreign discovery letters (0200)  Avoidance Action Litigation; O/cs w/MAF re: 0.10 27.50 A proper name for OSDF Ltd. for purposes of service of subpoena pursuant to federal rules (0200)  Avoidance Action Litigation; Review 0.70 192.50 A memoranda summarizing discovery re: OSDF Ltd. and OSDF Equity AC (3900)  Avoidance Action Litigation; O/cs w/MAF re: 0.20 55.00 A foreign discovery to be sent to OSDF and Peregrine Strategies (0200)  Avoidance Action Litigation; O/c w/AMB re: 0.20 55.00 A calls to court and follow up with J. Brizuela of  | calls w/clerk re: proof of service and R. Kaye re: motion to extend (0200)   |      |        | AHC |
| memoranda summarizing potential noteholders re: Shield Securities to determine whether they will be included in amended complaint (3900) Avoidance Action Litigation; Review 0.20 55.00 A correspondence from S. Sullivan re: confirmed addresses for OSDF and Peregrine Strategies Two (3900) Avoidance Action Litigation; Email to MAF re: 0.10 27.50 A outstanding foreign discovery letters (0200)  Avoidance Action Litigation; O/cs w/MAF re: 0.10 27.50 A proper name for OSDF Ltd. for purposes of service of subpoena pursuant to federal rules (0200) Avoidance Action Litigation; Review 0.70 192.50 A memoranda summarizing discovery re: OSDF Ltd. and OSDF Equity AC (3900) Avoidance Action Litigation; O/cs w/MAF re: 0.20 55.00 A foreign discovery to be sent to OSDF and Peregrine Strategies (0200) Avoidance Action Litigation; O/c w/AMB re: 0.20 55.00 A calls to court and follow up with J. Brizuela of   | from Venable, counsel for Gatex re: CUSIP numbers (3900)   |      |        | АНС |
| correspondence from S. Sullivan re: confirmed addresses for OSDF and Peregrine Strategies Two (3900) Avoidance Action Litigation; Email to MAF re: 0.10 27.50 A outstanding foreign discovery letters (0200)  Avoidance Action Litigation; O/cs w/MAF re: 0.10 27.50 A proper name for OSDF Ltd. for purposes of service of subpoena pursuant to federal rules (0200) Avoidance Action Litigation; Review 0.70 192.50 A memoranda summarizing discovery re: OSDF Ltd. and OSDF Equity AC (3900) Avoidance Action Litigation; O/cs w/MAF re: 0.20 55.00 A foreign discovery to be sent to OSDF and Peregrine Strategies (0200) Avoidance Action Litigation; O/c w/AMB re: 0.20 55.00 A calls to court and follow up with J. Brizuela of   | memoranda summarizing potential noteholders<br>re: Shield Securities to determine whether they<br>will be included in amended complaint (3900) |      |        | АНС |
| outstanding foreign discovery letters (0200)  Avoidance Action Litigation; O/cs w/MAF re: 0.10 27.50 A proper name for OSDF Ltd. for purposes of service of subpoena pursuant to federal rules (0200)  Avoidance Action Litigation; Review 0.70 192.50 A memoranda summarizing discovery re: OSDF Ltd. and OSDF Equity AC (3900)  Avoidance Action Litigation; O/cs w/MAF re: 0.20 55.00 A foreign discovery to be sent to OSDF and Peregrine Strategies (0200)  Avoidance Action Litigation; O/c w/AMB re: 0.20 55.00 A calls to court and follow up with J. Brizuela of  | correspondence from S. Sullivan re: confirmed addresses for OSDF and Peregrine Strategies  | 0.20 | 55.00  | АНС |
| proper name for OSDF Ltd. for purposes of service of subpoena pursuant to federal rules (0200)  Avoidance Action Litigation; Review 0.70 192.50 A memoranda summarizing discovery re: OSDF Ltd. and OSDF Equity AC (3900)  Avoidance Action Litigation; O/cs w/MAF re: 0.20 55.00 A foreign discovery to be sent to OSDF and Peregrine Strategies (0200)  Avoidance Action Litigation; O/c w/AMB re: 0.20 55.00 A calls to court and follow up with J. Brizuela of   |  | 0.10 | 27.50  | AHC |
| memoranda summarizing discovery re: OSDF Ltd. and OSDF Equity AC (3900) Avoidance Action Litigation; O/cs w/MAF re: 0.20 55.00 A foreign discovery to be sent to OSDF and Peregrine Strategies (0200) Avoidance Action Litigation; O/c w/AMB re: 0.20 55.00 A calls to court and follow up with J. Brizuela of   | proper name for OSDF Ltd. for purposes of service of subpoena pursuant to federal rules  | 0.10 | 27.50  | АНС |
| Avoidance Action Litigation; O/cs w/MAF re: 0.20 55.00 A foreign discovery to be sent to OSDF and Peregrine Strategies (0200) Avoidance Action Litigation; O/c w/AMB re: 0.20 55.00 A calls to court and follow up with J. Brizuela of   | Avoidance Action Litigation; Review memoranda summarizing discovery re: OSDF   | 0.70 | 192.50 | AHC |
| Avoidance Action Litigation; O/c w/AMB re: 0.20 55.00 A calls to court and follow up with J. Brizuela of   | Avoidance Action Litigation; O/cs w/MAF re: foreign discovery to be sent to OSDF and   | 0.20 | 55.00  | AHC |
|  | calls to court and follow up with J. Brizuela of   | 0.20 | 55.00  | АНС |

| Invoice #: | 3555 <sub>-72</sub> mg          | Doc 27994-4  | Filed                | 05/21/12<br>Pg <sup>a</sup> §9 of | Entered    | 05/21/12 18:33:27 | ' Exhibit D |
|------------|---------------------------------|--|----------------------|-----------------------------------|------------|-------------------|-------------|
|            |                                 | e Action Litigation lum of law to mot (3900)   |                      |                                   | 4.75       | 1,187.50          | RKR         |
| Dec-12-11  | Avoidanc and comm               | e Action Litigation<br>nent on draft brief<br>applaint (3900)                            |                      |                                   | 2.60       | 1,547.00          | VTC         |
|            | Avoidance from Julia response t | e Action Litigation B. Mosse counse o request for supp utions (3900)                     | l for As             | teri re:                          | 0.10<br>on | 45.00             | AMB         |
|            | Avoidance from S. B.            | e Action Litigation<br>connet re: supplem<br>Life and Safety Na                          | ental pr             | oduction of                       | 0.10       | 45.00             | AMB         |
|            | Avoidance edits to M (3900)     | e Action Litigation otion to amend an  | n; Revie<br>nended   | ew VTC's<br>Complaint             | 0.40       | 180.00            | AMB         |
|            | discovery defendant             | e Action Litigation<br>letters to potential<br>s OSDF, Big Horrand<br>and Starling Strat | l noteho<br>ı, Pereg | lder<br>rine                      | 0.60       | 150.00            | MAF         |
|            | of service                      | e Action Litigation to update status of sto be named in a (3900)                         | f list of            | potential                         | s 0.20     | 50.00             | MAF         |
|            | correspon                       | e Action Litigation<br>dence to Terwin to<br>with mileage and                            | supple               |                                   | 0.30       | 75.00             | MAF         |
|            | w/M. Moo                        | e Action Litigation<br>the, counsel for Gar<br>r Gatex's investm                         | atex re:             | ISIN                              | 0.20       | 55.00             | АНС         |
|            | memorano                        | e Action Litigation<br>la summarizing C<br>to provide to Gat                             | USIPs/I              | SINs for                          | 0.30       | 82.50             | АНС         |
|            | Moche, co                       | e Action Litigation<br>unsel for Gatex seed to 801 Grand (3                              | eeking r<br>8900)    | esponsive                         |            | 27.50             | AHC         |
|            | clerk for J                     | e Action Litigation<br>udge Peck's cham<br>order on disk re: n                           | bers re:             | receipt of                        | 0.10       | 27.50             | АНС         |
|            | Avoidance<br>and sign fo        | Action Litigation<br>preign discovery loch as Peregrine St                               | etters to            | be sent to                        | 0.10       | 27.50             | АНС         |
|            |                                 | Action Litigation leave to amend a   |                      |                                   | 0.60       | 165.00            | АНС         |
|            |                                 | Action Litigation eave to amend am   |                      |                                   | 0.60       | 165.00            | AHC         |

| Invoice #: | 3555 <sub>-</sub> mg                       | Doc 27994-4  | Filed 05/21/12<br>Pg <sup>24</sup> 0 of 70               | Entered 05/ | 21/12 18:33:27 | Exhibit D | March |
|------------|--|--|--|-------------|----------------|-----------|-------|
|            | correspon<br>Royal Ba                      | e Action Litigatio<br>dence from J. Gar<br>neshares of PA re:<br>Subpoena (3900) | rity, counsel for  | 0.10        | 27.50          | АНС       |       |
|            | Avoidance edits to m                       | e Action Litigatio<br>emorandum of lav<br>amend (3900)                           |  | 0.30        | 82.50          | AHC       |       |
|            | Avoidanc                                   | e Action Litigatio<br>dum of law in sup  |  | 0.70        | 192.50         | АНС       |       |
|            | Avoidance organize of expedited Strategies | e Action Litigatio   | Exhibits A to C re: o Starling ared Funding,             | 0.60        | 69.00          | НК        |       |
| Dec-13-11  |  | s re: class action i   | n; Review cases on ssues for amending                    | 1.60        | 952.00         | VTC       |       |
|            | Avoidanc                                   | e Action Litigation  | n; Review email<br>oc production (3900)                  | 0.10        | 45.00          | AMB       |       |
|            | from I. Dresponse                          | • •  | n; Review email nental information in ng information re: | 0.10        | 45.00          | AMB       |       |
|            | and accor                                  | npanying docs for<br>or defendant Royal  | n: Draft subpoena<br>potential<br>Bancshares of PA,      | 0.60        | 150.00         | MAF       |       |
|            | Avoidanc productio                         |  | 1 5 0  | 0.20        | 50.00          | MAF       |       |
|            | Brizuela i                                 | e Action Litigation<br>From LBHI's emaing deals (3900)                           | n; Review J.<br>l re: ADR changes                        | 0.10        | 27.50          | АНС       |       |
|            | Avoidance deVyver,                         | e Action Litigation<br>counsel for Bank<br>email re: BNY Mo                      |  | 0.10        | 27.50          | AHC       |       |
|            |  | e Action Litigation<br>or Gatex re: newly  | n; T/c w/M. Moche, sissued subpoena                      | 0.10        | 27.50          | AHC       |       |
|            | Avoidanc<br>subpoena                       | to Royal Bancsha   | ` '  | 0.10        | 27.50          | AHC       |       |
|            | revise me received f                       | -  |  | 0.40        | 110.00         | AHC       |       |

| 08-13<br>Invoice #: | 8555 <u>-</u> mg<br>22186                | Doc 27994-4   | Filed 05/21/12<br>Pg <sup>a</sup> 41 of   | Entered 0 | 05/21/12 18:33:27 | Exhibit D | March          |
|---------------------|--|---|---|-----------|-------------------|-----------|----------------|
|                     | subpoena                                 | e Action Litigation<br>to M. Moche, cou<br>v CUSIPs (3900)                                |   | 0.40      | 110.00            | AHC       |                |
|                     | Avoidance                                | Action Litigation   | n; Review subpoena<br>for WFD's signature |           | 55.00             | AHC       |                |
|                     | Avoidance<br>service of                  | e Action Litigation<br>subpoena on Roya<br>nia (0200)                                     | n; O/c w/MAF re:<br>al Bancshares of      | 0.10      | 27.50             | AHC       |                |
|                     | Avoidance                                | e Action Litigation<br>Pyxis defendants a   |   | 2.10      | 577.50            | AHC       |                |
|                     | Avoidance organize c subpoena            | Action Litigation Action Litigation opies of document to be sent to DLS                   | t request and for service upon            | 0.20      | 23.00             | НК        |                |
| Dec-14-11           | Avoidance                                | pital LLC for MA<br>Action Litigation<br>rextending time t                                | n: Review notice of                       | 0.10      | 65.00             | WAM       |                |
|                     | Avoidance                                | Action Litigation   | n: O/c w/WFD re:<br>ding time to serve    | 0.10      | 65.00             | WAM       |                |
|                     | Avoidance from D. Processing Corp. re: r | e Action Litigation<br>aglessi, director of<br>esponse to subpose<br>in re: distributions | f KLIO II Funding<br>ena seeking          | 0.10      | 45.00             | AMB       |                |
|                     | Avoidance<br>revise ema                  | e Action Litigation<br>til to F. Top repres<br>additional inform                          | n; Review and senting Diversity re        | 0.10      | 45.00             | AMB       |                |
|                     | Avoidance<br>revise ema                  | Action Litigation<br>til to J. Star for Er<br>for additional inf                          | nsign Peak Advisors                       | 0.10      | 45.00             | AMB       |                |
|                     | Avoidance<br>from AHC                    | e Action Litigation<br>Fre: t/c w/L. Kraid<br>olling agmt (0200                           | lin from Bank of                          | 0.10      | 45.00             | AMB       |                |
|                     | Avoidance<br>from AHC<br>National's      | Action Litigation<br>to S. Bonent coure: supplemental                                     | n; Review email nsel for Safety           | 0.10      | 45.00             | AMB       |                |
|                     | Avoidance<br>from F. To<br>supplemen     |   | utnam's<br>subpoena seeking               | 0.20      | 90.00             | AMB       | erninsser vær. |
|                     | Avoidance                                | n re: distributions Action Litigation Gatex for WFD                                       | i; Review discovery                       | 0.20      | 55.00             | AHC       |                |
|                     | for Lehma                                | e Action Litigation<br>in to ensure that macre (3900)                                     | n; Review agenda<br>notion to extend stay | 0.10      | 27.50             | AHC       |                |

| Invoice #8-13555-mg Doc 27994-4 Filed 05/21/12 Pg 42 of 70  | ntered 05/ | 21/12 18:33:27 | Exhibit D |
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| Avoidance Action Litigation; Emails w/ADR re: docs to creditors committee (0200)  | 0.10       | 27.50          | AHC       |
| Avoidance Action Litigation; O/c w/MAF rechecks sent to Terwin Capital LLC (0200)   | 0.10       | 27.50          | AHC       |
| Avoidance Action Litigation; Review Putnam 2002-1 document production (3900)  | 0.60       | 165.00         | AHC       |
| Avoidance Action Litigation; Draft memoranda summarizing Putnam 2002-1 document production (3900)   | 0.40       | 110.00         | AHC       |
| Avoidance Action Litigation; Draft follow up email to F. Top, counsel for US Bank, Trustee for Putnam 2002-1 seeking information re: distribution it claims not to have received (3900) | 0.20       | 55.00          | АНС       |
| Avoidance Action Litigation; Review Putnam 2002-3 document production (3900)  | 0.60       | 165.00         | AHC       |
| Avoidance Action Litigation; Draft memoranda summarizing Putnam 2002-3 production (3900)  | 0.30       | 82.50          | AHC       |
| Avoidance Action Litigation; Draft follow up<br>memoranda summarizing additional information<br>sought from F. Top, counsel for US Bank,<br>Trustee for Putnam 2002-1 (3900)            | 0.20       | 55.00          | АНС       |
| Avoidance Action Litigation; Email to M. Moche at Venable re: revised discovery request to Gatex (3900)   | 0.10       | 27.50          | АНС       |
| Avoidance Action Litigation; Review supplemental production received by Safety National (3900)  | 0.60       | 165.00         | AHC       |
| Avoidance Action Litigation; Update memoranda summarizing supplemental production by Safety National (3900)   | 0.30       | 82.50          | AHC       |
| Avoidance Action Litigation; Draft response to S. Bonnet, counsel for Safety national seeking follow up information re: Sunset Park CDO (3900)  | 0.20       | 55.00          | АНС       |
| Avoidance Action Litigation; T/c w/L. Kraidin, counsel for Bank of China re: stipulation and tolling agreement (3900)   | 0.20       | 55.00          | AHC       |
| Avoidance Action Litigation; Email to AMB recall w/ L. Kraidin, counsel for Bank of China re: stipulation and tolling agreement (3900)  | 0.10       | 27.50          | AHC       |
| Avoidance Action Litigation; Review supplemental production from Ensign Peak Advisors (3900)  | 0.80       | 220.00.        | AHC       |
| Avoidance Action Litigation; Draft follow up<br>email to J. Starr, counsel for Ensign Peak<br>Advisors re: supplemental production (3900)   | 0.20       | 55.00          | АНС       |
| Avoidance Action Litigation; Review fax from HSBC Bank PLC (3900)   | 0.10       | 27.50          | AHC       |

| Avoidance Action Litigation; Email to SCB re: fax from HSBC Bank PLC and it status as common depository and whether it has information re noteholders (0200)   | 0.10 | 27.50  | АНС |
|--|------|--------|-----|
| Avoidance Action Litigation; Review document production from First Trust Strategic High Income Fund I, II and III (3900)   | 0.70 | 192.50 | AHC |
| Avoidance Action Litigation; Draft memoranda summarizing document production from First Trust Strategic High Income Fund I, II and III (3900)  | 0.20 | 55.00  | АНС |
| Avoidance Action Litigation; Update<br>memoranda summarizing distributions made to<br>each potential noteholder with information from<br>First Trust Strategic High Income Funds I, II<br>and III (3900) | 0.20 | 55.00  | АНС |
| Avoidance Action Litigation; Review Diversey Harbor's supplemental document production (3900)  | 0.60 | 165.00 | AHC |
| Avoidance Action Litigation; Draft memoranda summarizing Diversey Harbor supplemental document production (3900)   | 0.20 | 55.00  | AHC |
| Avoidance Action Litigation; Draft follow up<br>email to F. Top, counsel for Diversey Harbor<br>seeking additional information re: Diversey<br>Harbor's sale of Pyxis Class C securities (3900)          | 0.10 | 27.50  | АНС |
| Avoidance Action Litigation; Prepare first request for document production and cover letter to be sent to Gatex Properties for MAF (3900)  | 0.10 | 11.50  | НК  |
| Avoidance Action Litigation; Review notice<br>from Court re: entering Order re: extension of<br>Stay re: SPV matter (3900)   | 0.10 | 45.00  | AMB |
| Avoidance Action Litigation; Emails to/from AHC re: how to send letters re: notice of plan to amend complaint (0200)   | 0.10 | 45.00  | AMB |
| Avoidance Action Litigation; O/c w/AHC restatus of serving potential noteholder defendants and sending notice letters of amended complaint (0200)  | 0.60 | 150.00 | MAF |
| Avoidance Action Litigation; Research and draft lengthy memo/table w/potential noteholder defendants to serve or follow up w/for doc requests (3900)   | 3.10 | 775.00 | MAF |
| Avoidance Action Litigation; Long mtg w/MAF re: sending out of additional subpoenas and foreign discovery letters, following up with entities who have not   | 0.40 | 110.00 | АНС |

Dec-15-11

| 08-1<br>Invoice #: | 3555-mg Doc 27994-4 Filed 05/21/12<br>22180 Pg 44 of  | Entered 05/2 | 21/12 18:33:2 | ?7 Exhibit D |
|--------------------|---|--------------|---------------|--------------|
|                    | responded, sending out correspondence re:<br>notice of amended complaint (0200)   | 0.20         | 55.00         | AHG          |
|                    | Avoidance Action Litigation; Review discovery re: information on Ohio PERS to determine reason for rejection of service from CSC (3900)   | 0.20         | 55.00         | АНС          |
| Dec-16-11          | Avoidance Action Litigation: T/c w/Diane C. re: status of subpoena responses and o/c w/KJM re: BNP extension re: same (0200)  | 0.30         | 178.50        | WFD          |
|                    | Avoidance Action Litigation: Review email from A. Rovira and WFD re: Magnetar's supplemental production (3900)  | 0.10         | 45.00         | AMB          |
|                    | Avoidance Action Litigation: Review email from J. Dorchak re: The Bank of Fukuoka, Ltd re: dismissal (3900)   | 0.20<br>i.   | 90.00         | AMB          |
|                    | Avoidance Action Litigation: Review email from Simone Bonnet counsel for Safety National Casualty Corporation re: supplementa production in response to subpoena seeking information re: distributions (3900) | 0.20<br>al   | 90.00         | AMB          |
|                    | Avoidance Action Litigation: Review email from M. Breen, counsel for Whitehawk re: incorrect address for Whitehawk re: serving discovery seeking information re: distributions (3900)                         | 0.20         | 90.00         | AMB          |
|                    | Avoidance Action Litigation: Revise chart of discovery requests sent to potential noteholder defendants (3900)  | 0.60         | 150.00        | MAF          |
|                    | Avoidance Action Litigation; T/c w/WFD re: call from L. Goldberg at Weil re: stay brief (0200)  | 0.10         | 27.50         | АНС          |
|                    | Avoidance Action Litigation; T/c w/L.<br>Goldberg of Weil from Weil re: edits to stay<br>portion of brief (0700)  | 0.20         | 55.00         | АНС          |
|                    | Avoidance Action Litigation; Review email from L. Goldberg of Weil re: schedule attached to brief and resolution of avoidance actions (3900)  | 0.10<br>d    | 27.50         | АНС          |
|                    | Avoidance Action Litigation; Review memoranda summarizing information re: Bank of Fukuoka and its interest in Crown City 2005-1 (3900)  | 0.20         | 55.00         | АНС          |
| Dec-18-11          | Avoidance Action Litigation: Emails to/from AHC and PW re: address for PPL to serve subpoena seeking information re: distributions (3900)   | 0.10         | 45.00         | AMB          |
|                    | Avoidance Action Litigation; Email to P.<br>Anderson of LLS re: address for Whitehawk<br>CDO Funding 2004-1 (3900)  | 0.10         | 27.50         | АНС          |

| Invoice #: 08-13 | 3555 <sub>2</sub> 719g                             | Doc 27994-4  | Filed 05/21/12 - 1<br>Pg 45 of 70         | Entered 05/2 | 21/12 18:33:27 | Exhibit D |
|------------------|--|--|---|--------------|----------------|-----------|
|                  | memoran  | s for notice for san   | ewly added entities                       | 0.40         | 110.00         | АНС       |
|                  | Avoidance revise ext                               | e Action Litigation ibit c for foreign of Life and Annuity           | discovery letter to                       | 0.10         | 27.50          | АНС       |
|                  | Avoidance revise ext                               | e Action Litigation ibit c for foreign of Life and Annuity           | liscovery letter to                       | 0.10         | 27.50          | АНС       |
|                  | Austracle  | e Action Litigation<br>ar and information<br>re: same (0200)         | n; Email to AMB re:<br>obtained from      | 0.10         | 27.50          | AHC       |
|                  | Avoidanc   | e Action Litigation to be sent to Tierr                              | n; Email to MAF re:<br>a Alta Funding I   | 0.10         | 27.50          | AHC       |
|                  | Avoidance<br>Alta CDC<br>2007-2 Se<br>distribution | ,  | to address                                | 0.10         | 27.50          | АНС       |
|                  |  | -  | n; Draft Exhibit C<br>o be sent to lancer | 0.20         | 55.00          | AHC       |
|                  | Avoidanc   | e Action Litigation hibit C for subpoer                              |   | 0.10         | 27.50          | AHC       |
|                  | for foreign  | e Action Litigation<br>n discovery letter t<br>I Ltd. (3900)         | n; Draft Exhibit C<br>o be sent to Lancer | 0.20         | 55.00          | АНС       |
|                  | for foreign  | e Action Litigation<br>of discovery letter to<br>the CDO (3900)      |   | 0.20         | 55.00          | AHC       |
|                  | for foreign  | e Action Litigation<br>of discovery letter to<br>Point Funding (390) | o be sent to                              | 0.20         | 55.00          | AHC       |
|                  | Avoidanc for foreign                               | e Action Litigation<br>of discovery letter to<br>stodial (3900)      | ı; Draft Exhibit C                        | 0.20         | 55.00          | АНС       |
|                  | Avoidance<br>MAF re: 6                             | e Action Litigation<br>entities to follow u<br>obtain, foreign dis   | p with, affidavits of                     | 0.30         | 82.50          | АНС       |
| Dec-19-11        | Avoidance re: info fo                              | e Action Litigation r stay motion (390                               | · /                                       | 0.20         | 90.00          | AMB       |
|                  | Goldberg   | e Action Litigation re: stay motion (39                              | 900)                                      | 0.20         | 90.00          | AMB       |
|                  |  | Action Litigation  |   | 0.10         | 45.00          | AMB       |

Dec-19-1

finalize subpoena to Genworth Life and

| 3  |      |        |     |
|--|------|--------|-----|
| Annuity Ins. Co LV STISL seeking             |      |        |     |
| information re: distributions (3900)         |      |        |     |
| Avoidance Action Litigation: Review and      | 0.10 | 45.00  | AMB |
| finalize subpoena to Lancer Funding II, LLC  |      |        |     |
| seeking information re: distributions (3900) |      |        |     |
| Avoidance Action Litigation: Review and      | 0.20 | 90.00  | AMB |
| finalize subpoena to U.S. Bank National      |      |        |     |
| Association as Trustee for Montrose Harbor   |      |        |     |
| CDO I, Inc. seeking information re:          |      |        |     |
| distributions (3900)                         |      |        |     |
| Avoidance Action Litigation: Review email    | 0.10 | 45.00  | AMB |
| from D. Puglesi re: response to subpoena     |      |        |     |
| seeking information from Whitehawk CDO       |      |        |     |
| Funding LLC (3900)                           |      |        |     |
| Avoidance Action Litigation Draft subpoena   | 0.40 | 100.00 | MAF |
| and accompanying cover letter and notice of  |      |        |     |
| subpoena to potential noteholder defendant   |      |        |     |
| Tierra Alta Funding (3900)                   |      |        |     |
| Avoidance Action Litigation: Draft subpoena  | 0.40 | 100.00 | MAF |
| and accompanying cover letter and notice of  |      |        |     |
| subpoena to potential noteholder defendant   |      |        |     |
| Montrose Harbor CDO I (3900)                 |      |        |     |
| Avoidance Action Litigation: Draft subpoena  | 0.40 | 100.00 | MAF |
| and accompanying cover letter and notice of  |      |        |     |
| subpoena to potential noteholder defendant   |      |        |     |
| Genworth Life and Annuity LV SPIA (3900)     |      |        |     |
| Avoidance Action Litigation: Draft subpoena  | 0.30 | 75.00  | MAF |
| and accompanying cover letter and notice of  |      |        |     |
| subpoena to potential noteholder defendant   |      | 1      |     |
| Genworth Life and Annuity LV STISL (3900)    |      |        |     |
| Avoidance Action Litigation: Draft subpoena  | 0.40 | 100.00 | MAF |
| and accompanying cover letter and notice of  |      |        |     |
| subpoena to potential noteholder defendant   |      |        |     |
| Standard Life Insurance of Indiana (3900)    |      |        |     |
| Avoidance Action Litigation: Draft subpoena  | 0.40 | 100.00 | MAF |
| and accompanying cover letter and notice of  |      |        |     |
| subpoena to potential noteholder defendant   |      |        |     |
| Putnam Fiduciary Trust Co. (3900)            |      |        |     |
| Avoidance Action Litigation; Draft subpoena  | 0.40 | 100.00 | MAF |
| and accompanying cover letter and notice of  |      |        |     |
| subpoena to potential noteholder defendant   |      |        |     |
| Stifel, Nicolaus and Company (3900)          |      |        |     |
| Avoidance Action Litigation: Draft subpoena  | 0.40 | 100.00 | MAF |
| and accompanying cover letter and notice of  |      |        |     |
| subpoena to potential noteholder defendant   |      |        |     |
| Lancer Funding II, LLC (3900)                |      |        |     |
| Avoidance Action Litigation: Draft subpoena  | 0.40 | 100.00 | MAF |
| and accompanying cover letter and notice of  |      |        |     |
| subpoena to potential noteholder defendant   |      |        |     |
| Illinois Municipal Retirement Fund. (3900)   |      |        |     |
|  |      |        |     |

| 08-13555-mg Doc 27994-4 Filed 05/21/12 E  | Intered 05/ | /21/12 18:33:27 | Exhibit D |
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| Avoidance Action Litigation: Update list of affidavits of service and follow up with process server to obtain missing affidavits (3900)   | 0.30        | 75.00           | MAF       |
| Avoidance Action Litigation: Draft foreign discovery request to potential noteholder defendant Longshore CDO Funding 2007-3, Ltd. (3900)  | 0.30        | 75.00           | MAF       |
| Avoidance Action Litigation: Draft subpoena and accompanying cover letter and notice of subpoena to potential noteholder defendant  | 0.60        | 150.00          | MAF       |
| Fulton Street CDO Funding Corp. 3900) Avoidance Action Litigation; O/c w/AMB reedits to brief re: motion to stay and comments per L. Goldberg of Weil (0200)                                | 0.10        | 27.50           | АНС       |
| Avoidance Action Litigation; Review J. Brizuela of LBHI's comments re: dropping of issuers in case (3900)   | 0.10        | 27.50           | AHC       |
| Avoidance Action Litigation; O/c w/AMB recase status recase of foreign discovery letters (0200)   | 0.10        | 27.50           | AHC       |
| Avoidance Action Litigation; Briefly review<br>Order Granting Extension to Deadline for<br>Service to January 20, 2012 as filed on docket<br>(3900)   | 0.10        | 27.50           | AHC       |
| Avoidance Action Litigation; Review and revise subpoena to Montrose Harbor CDO I (3900)   | 0.20        | 55.00           | AHC       |
| Avoidance Action Litigation; Review and revise subpoena to be served upon Tierra Alta Funding (3900)  | 0.20        | 55.00           | AHC       |
| Avoidance Action Litigation; Review and revise subpoenas to be served upon Illinois Municipal Ret. Fund, Genworth Life and Annuity, and Lancer Funding (3900)                               | 0.30        | 82.50           | AHC       |
| Avoidance Action Litigation; T/c w/J. Dorchak, counsel for Bank of Fukuoka, re: stipulation and tolling agreement (3900)  | 0.10        | 27.50           | AHC       |
| Avoidance Action Litigation; T/c w/J. Port, counsel for Ridge Clearing re: Pebble Creek 2007-1 transaction (3900)   | 0.10        | 27.50           | AHC       |
| Avoidance Action Litigation; Research number of noteholders dismissed from case per L. Goldberg of Weil's request (3900)  | 0.40        | 110.00          | AHC       |
| Avoidance Action Litigation; Review and revise memoranda summarizing follow up requests to be sent to potential noteholders who have not responded to third-party discovery requests (3900) | 0.60        | 165.00          | AHC       |
| Assaidance Action Litigation, Lindate   | 0.20        | 55.00           | ATIC      |

0.20

55.00

AHC

Avoidance Action Litigation; Update memoranda summarizing list of incoming

| Pg 48 01 70  |      |        |     |
|--|------|--------|-----|
| noteholders to reflect Stifel Nicolaus, entity named by Ridge Clearing (3900)  |      |        |     |
| Avoidance Action Litigation; Research on registered agent for purposes of serving subpoena on Stifel Nicolaus pursuant to Federal Rules (3900)                                   | 0.20 | 55.00  | АНС |
| Avoidance Action Litigation; O/c w/MAF re: subpoena to Stiefel Nicolaus and service of same (0200)   | 0.10 | 27.50  | AHC |
| Avoidance Action Litigation; O/c w/AMB re: subpoena to Illinois Municipal Ret. Fund and address for service of subpoena pursuant to Federal Rules (0200)                         | 0.10 | 27.50  | АНС |
| Avoidance Action Litigation; Review document production by Ohio State University re: distribution made re: Pebble Creek 2007-2 (3900)  | 0.20 | 55.00  | АНС |
| Avoidance Action Litigation; Review and revise schedule C attached to subpoena to Stifel Nicolaus (3900)   | 0.10 | 27.50  | AHC |
| Avoidance Action Litigation; Edit Schedule 2 with addresses of counsels for each party and note the parties for which copies of affidavits of service are needed, for MAF (3900) | 1.80 | 207.00 | НК  |
| Avoidance Action Litigation; Scan cover letter, subpoena, notice of subpoena and checks for Pinnacle Point Funding Corp. (3900)  | 0.20 | 23.00  | ADR |
| Avoidance Action Litigation; Scan cover letter, subpoena, notice of subpoena and checks for KLIO II and III Funding Corp (3900)  | 0.30 | 34.50  | ADR |
| Avoidance Action Litigation; Scan cover letter, subpoena, notice of subpoena and checks for Liverpool Limited Partnership (3900)   | 0.20 | 23.00  | ADR |
| Avoidance Action Litigation; Scan cover letter, subpoena, notice of subpoena and checks for Stanton CDO (3900)   | 0.20 | 23.00  | ADR |
| Avoidance Action Litigation: Respond to requests from BNP for meet and confer (3900)   | 0.20 | 119.00 | WFD |
| Avoidance Action Litigation; T/c w/L.Goldberg re: fact checking Stay Motion (3900)   | 0.20 | 90.00  | AMB |
| Avoidance Action Litigation; Review and finalize subpoena on General Security National Ins. Seeking information re: distributions (3900)   | 0.10 | 45.00  | AMB |
| Avoidance Action Litigation; Review and finalize subpoena on Fulton Street CDO Funding Corp re: seeking information re: distributions (3900)                                     | 0.20 | 90.00  | AMB |
| Avoidance Action Litigation; Review and finalize subpoena on Phoenix Companies, Inc.   | 0.20 | 90.00  | AMB |

Dec-20-11

| . 9  |      |        |     |
|--|------|--------|-----|
| - d/b/a Phoenix Life Insurance Co. re: seeking information re: distributions (3900) Avoidance Action Litigation; Review and finalize foreign discovery letter on Longshore CDO Funding 2007-3, Ltd re: seeking information re: seeking information re: | 0.20 | 90.00  | AMB |
| distributions (3900) Avoidance Action Litigation; Review and finalize subpoena on Phoenix Companies, Incd/b/a Phoenix Home Life Variable Ins. Co. re:  | 0.10 | 45.00  | AMB |
| seeking information re: distributions (3900)<br>Avoidance Action Litigation; Review and<br>finalize subpoena on Longshore CDO Funding<br>2007-3, Ltd re: seeking information re:   | 0.20 | 90.00  | AMB |
| distributions (3900) Avoidance Action Litigation; Review and finalize subpoena on Standard Life Insurance Company of Indiana re: seeking information re:   | 0.20 | 90.00  | AMB |
| distributions (3900) Avoidance Action Litigation; Emails to/from L. Goldberg re: fact checking stay motion (3900)  | 0.10 | 45.00  | AMB |
| Avoidance Action Litigation: Revise subpoena and accompanying cover letter and notice of subpoena to potential noteholder defendant  | 0.60 | 150.00 | MAF |
| Standard Life Insurance of Indiana (3900) Avoidance Action Litigation: Draft subpoena and accompanying cover letter and notice of subpoena to potential noteholder defendant   | 0.60 | 150.00 | MAF |
| Phoenix Life Insurance Company (3900) Avoidance Action Litigation: Draft subpoena and accompanying cover letter and notice of subpoena to potential noteholder defendant Phoenix Home Life Variable Insurance  | 0.40 | 100.00 | MAF |
| Company (3900) Avoidance Action Litigation: Draft subpoena and accompanying cover letter and notice of subpoena to potential noteholder defendant  Marsh & McClennan Retirement Trust (2000)   | 0.40 | 100.00 | MAF |
| Marsh & McClennan Retirement Trust (3900) Avoidance Action Litigation: Draft subpoena and accompanying cover letter and notice of subpoena to potential noteholder defendant General Security National Insurance (3900)                                | 0.40 | 100.00 | MAF |
| Avoidance Action Litigation; Review MAF email re: status of service of potential   | 0.10 | 27.50  | AHC |
| noteholders (3900) Avoidance Action Litigation; Review and finalize subpoena directed to Fulton Street CDO Funding Corp. (3900)  | 0.20 | 55.00  | АНС |

| 08-13<br>Invoice #: | 555-mg D  | oc 27994-4  | Filed 05/21/12<br>Pg 50 of   | Entered 05/2 | 1/12 18:33:27 | Exhibit D |
|---------------------|---|---|--|--------------|---------------|-----------|
|                     |   | _   | n; Review<br>iscovery re: Pinnac   | 0.20<br>ele  | 55.00         | AHC       |
|                     | Avoidance A email re: stati   | action Litigation<br>cus of service we<br>for follow up for | n; Respond to MA. with additional or discovery to be tential noteholders   |              | 55.00         | АНС       |
|                     | Avoidance A revise foreig   | Action Litigation In discovery letter DO Funding 20         | er to be served upo  | 0.20<br>on   | 55.00         | AHC       |
|                     | Avoidance A outstanding   | ction Litigation discovery to be                            | n; O/c w/MAF re:   | 0.20         | 55.00         | AHC       |
|                     |   | upon Standard   | n; Review subpoer<br>Life Ins Co of  | na 0.10      | 27.50         | АНС       |
|                     | Avoidance A   | ection Litigation be served upon                            |  | 0.20         | 55.00         | AHC       |
|                     | Avoidance A<br>registered ag<br>General Secu  | ents for service  | n; Research for<br>of subpoena upon<br>nsurance and Mars<br>rust (3900)  |              | 110.00        | AHC       |
|                     | Avoidance A finalize subp   | action Litigation<br>oena to be sent<br>Master Ret. Trus    | n; Review and<br>to marsh &  | 0.20         | 55.00         | АНС       |
|                     | Avoidance A   | ction Litigation  | n; Review subpoen<br>ty Nat'l Insurance  | a 0.20       | 55.00         | АНС       |
|                     | Avoidance A<br>compile cove<br>amended cor<br>DLS for serv<br>Company of<br>Company, Pl<br>Insurance Co | ice upon Stand<br>Indiana, Phoen<br>noenix Home L           | enas, notices,<br>rders to be sent to<br>ard Life Insurance<br>ix Life Insurance<br>ife Variable<br>alton Street CDO | 1.10         | 126.50        | НК        |
|                     | copies of No  | ection Litigation<br>tices of subpoer<br>o Epiq (3900)      | n; Save and email na to MAF for  | 0.40         | 46.00         | ADR       |
| Dec-21-11           | Avoidance A compile cove complaint, an service upon   | etion Litigation<br>er letter, subpos                       | ena, notice, amendo<br>be sent to DLS fo   |              | 46.00         | HK        |
| Dec-22-11           | Avoidance A   |   | n: Calls to/from<br>se to subpoena   | 0.30         | 178.50        | WFD       |

| Invoice   | 08-13555-mg Doc 27994-4 Filed 05/21/12 5<br>Pg \$1 of 70  | Entered 05/ | 21/12 18:33:27 | Exhibit D |
|-----------|---|-------------|----------------|-----------|
|           | Avoidance Action Litigation; Emails to/from J.Moses counsel for Asteri re: needing additional information re: distributions (3900)                            | 0.10        | 45.00          | AMB       |
|           | Avoidance Action Litigation; Review Cannington Funding production (3900)  | 0.40        | 110.00         | AHC       |
|           | Avoidance Action Litigation; Emails to/from ADR re: discovery to be sent to Creditors Committee (0200)  | 0.20        | 55.00          | АНС       |
|           | Avoidance Action Litigation; O/cs w/ADR re: discovery to be sent to Creditors Committee (0200)  | 0.20        | 55.00          | АНС       |
|           | Avoidance Action Litigation; Draft memoranda summarizing Cannington Funding production (3900)   | 0.40        | 110.00         | AHC       |
|           | Avoidance Action Litigation; Review<br>Nationwide Mutual Co's response to LBSF's<br>follow up questions re: distributions (3900)                              | 0.40        | 110.00         | AHC       |
|           | Avoidance Action Litigation; Update list of potential foreign noteholders that have responded to discovery requests (3900)                                    | 0.40        | 46.00          | ADR       |
|           | Avoidance Action Litigation; Organize and prepare discovery materials and draft cover letter to creditors' committee for same (3900)                          | 1.10        | 126.50         | ADR       |
| Dec-27-11 | Avoidance Action Litigation: Review response<br>to discovery request from HSBC Bank plc as<br>common depository and prep summary (3900)                       | 0.30        | 178.50         | SCB       |
|           | Avoidance Action Litigation: O/c w/FWS re: status of subpoena responses and respond to emails re: extensions granted for responses (0200)                     | 0.40        | 238.00         | WFD       |
|           | Avoidance Action Litigation: Review and execute subpoena to LaSall Bank NA Trustee for Lancer Funding II, LLC (3900)  | 0.10        | 45.00          | AMB       |
|           | Avoidance Action Litigation: Review and edit<br>email to J. Browning, counsel for Stifel, re<br>request for additional time to respond to<br>discovery (3900) | 0.10        | 45.00          | AMB       |
|           | Avoidance Action Litigation: Review email from SCB re: analysis of HSBC's response to discovery (3900)  | 0.10        | 45.00          | AMB       |
|           | Avoidance Action Litigation: Emails to/from L.Goldberg re: filing of stay/extension to serve motion (0700)  | 0.10        | 45.00          | AMB       |
|           | Avoidance Action Litigation: O/c w/WFD re: responses to Rule 2004 subpoenas (0200)  | 0.10        | 27.50          | FWS       |
|           | Avoidance Action Litigation: Review response to Rule 2004 subpoena from RBS (3900)  | 0.30        | 82.50          | FWS       |
|           | Avoidance Action Litigation: Review docs filed  | 0.20        | 55.00          | FWS       |

on docket re: Rule 2004 subpoena (3900)

| Invoice #:                              | 3555 <sub>2</sub> mg                | Doc 27994-4   | Filed 05/21/12<br>Pg 52 of 7                                    | Entered 05/ | 21/12 18:33:27 | Exhibit D | March |
|---|-------------------------------------|---|---|-------------|----------------|-----------|-------|
|   | provide c                           | e Action Litigation on Fidentiality in restored to Goldman (3900)               | -   | 0.40        | 110.00         | FWS       |       |
|   | Avoidanc                            | e Action Litigation   | n: T/c w/Goldman<br>2004 exam (3900)                            | 0.20        | 55.00          | FWS       |       |
|   | Avoidanc                            | e Action Litigation   | n: Email to Goldmar<br>onse and next steps                      | 0.30        | 82.50          | FWS       |       |
|   | Àvoidanc                            | e Action Litigation<br>n subpoena (3900   | n: Review Goldman   | 0.30        | 82.50          | FWS       |       |
|   | and according subpoena              | e Action Litigation<br>inpanying cover let<br>to potential noteholinding (3900) |   | 0.60        | 150.00         | MAF       |       |
|   | Avoidanc                            | e Action Litigation notice to be sent   | n; O/c w/MAF re:<br>to all potential                            | 0.10        | 27.50          | AHC       |       |
|   | Avoidanc<br>re: follow<br>potential | e Action Litigation up phone calls to   | n; Emails w/AMB<br>counsel for various<br>ling Steifel, Phoenix | 0.10        | 27.50          | АНС       |       |
|   |                                     | e Action Litigations, counsel for Stife (0200)                                  |   | 0.10        | 27.50          | AHC       |       |
|   | Avoidanc                            | e Action Litigation, counsel for Stife  |   | 0.20        | 55.00          | AHC       |       |
|   | Avoidanc<br>Silvermar               | e Action Litigation<br>a, counsel for General<br>e: LBSF subpoents              | eral Securities   | 0.10        | 27.50          | AHC       |       |
|   | Avoidanc<br>Romanow                 | e Action Litigation<br>ska, counsel for P<br>deadlines (3900)                   | n; T/c w/A.   | 0.20        | 55.00          | AHC       |       |
|   | Avoidanc<br>Romanow                 |   | n; Draft email to A.<br>Phoenix Life re:                        | 0.10        | 27.50          | АНС       |       |
|   | Avoidanc                            | e Action Litigation  Ibpoena to be serv   |   | 0.20        | 55.00          | AHC       |       |
| Dec-28-11                               | Avoidanc<br>from AHO<br>Nicolaus    | e Action Litigation<br>C to J.Browning, c<br>& Company, Inc. r                  | ounsel for Stifel,  | 0.10        | 45.00          | AMB       |       |
| estre esta, state, activity services of | from F.To response t                | p re: Montrose Ha<br>o subpoena seekir  | n: Review response arbor CDO I, Inc.'s ng info re:              | 0.10        | 45.00          | AMB       |       |
|   | potential r                         | ons (3900)  e Action Litigation  noteholder defendation  with for documen       | ants to serve or  | 0.60        | 150.00         | MAF       |       |

| Invoice #: 08-13 | 3555 <sub>-</sub> mg<br>22186                                   | Doc 27994-4  | Filed 05/<br>Pg  | 21/12<br><sup>a</sup> §3 of 70 | Entered 05/2 | 1/12 18:33:27 | ' Exhibit D |
|------------------|---|--|--|--------------------------------|--------------|---------------|-------------|
|                  | letters requipotential rulestment Partnershi SMH Cap Funding; l | e Action Litigation uesting production to teholder defendent Grade Fixed Incep; Silvermine Capital Advisors; Where Brookfield Investrio Ahmad Capital  | n of docume<br>ants Forwar<br>ome Fund;<br>sital Manag<br>itehawk CE<br>nent Manag | ents to d HHE ement;           | 1.40         | 350.00        | MAF         |
|                  | Silverman<br>Insurance  | e Action Litigation, counsel for General Co. re extension of the country of the c | eral Sec. Na<br>of time to re  | spond to                       | 0.20         | 55.00         | АНС         |
|                  | Silverman   | e Action Litigation, counsel for Gen. g scope of subpoe  | Sec. Nat'l   | Ins. Co.                       | 0.20         | 55.00         | АНС         |
|                  | Avoidance<br>from SCB<br>Depositor                              | e Action Litigation<br>re: HSBC Issuer<br>y Nominee and fur<br>es such as Eurocle  | Services Conction of co  | ommon<br>ommon                 | 0.20         | 55.00         | АНС         |
|                  | revise lette<br>additional                                      | e Action Litigation<br>er to Creditors Condocument product<br>o expedited discovery  | mmittee end<br>tions, as red   | closing<br>quired              | 0.30         | 82.50         | АНС         |
|                  | Nationwid   | e Action Litigation<br>e Mutual Insurand<br>production (3900   | ce suppleme  |                                | 0.40         | 110.00        | AHC         |
|                  | Avoidance<br>organize n<br>order, and<br>upon LaSa              | e Action Litigation<br>otice, subpoena, a<br>checks to be sent<br>alle Bank National<br>Lancer Funding I   | n; Review a<br>mended co<br>to DLS for<br>l Association                            | mplaint,<br>service<br>on,     | 0.40         | 46.00         | НК          |
| Dec-29-11        | finalize su<br>Assurance  | e Action Litigation<br>bpoena directed to<br>Co. of Canada Uniformation re: disti  | o Sun Life<br>S – Sun US   | MVA                            | 0.20         | 90.00         | AMB         |
|                  | Avoidance and accom   | Action Litigation panying cover let to potential notehouse.  | n: Draft subter and noti   | poena<br>ce of                 | 0.40         | 100.00        | MAF         |
|                  | Avoidance<br>Silverman  | Action Litigation<br>re: General Sec. 1<br>and send same (39)  | Nat'l Life In  |                                | 0.10         | 27.50         | AHC -       |
|                  | Avoidance   | Action Litigation<br>bpoena to be sent   | ı; Řeview a  |                                | 0.20         | 55.00         | АНС         |

| Invoice #8-13 | 555 <u>-</u> դց <sub>6</sub>                                      | Doc 27994-4  | Filed                                       | 05/21/12<br>Pg 54 of                              |           | 5/21/12 18:33:27 | Exhibit D |
|---------------|---|--|---|---|-----------|------------------|-----------|
|               | follow up<br>responded  | e Action Litigation letters to entities and potentially puthe amended com                          | that har<br>providin                        | ve not<br>ig them with                            | 0.10      | 27.50            | AHC       |
|               | Avoidance letter to CCCD for co                                   | e Action Litigation Creditors' Commit ommittee of disconnoteholders (3906)                         | on; revisitee and very ma                   | se and update create new                          |           | 103.50           | ADR       |
|               | Avoidanc  | e Action Litigation of Notice of Notice 1  | n File A                                    |   | 0.30<br>C | 34.50            | ADR       |
| Dec-30-11     | Avoidanc  | e Action Litigation e: motion to amer  |   |   | 0.10      | 45.00            | AMB       |
|               |   | e Action Litigation from AHC re: no (0)  |   |   | 0.20      | 90.00            | AMB       |
|               | Avoidanc  | e Action Litigation re service in Taix   |   |   | 0.10      | 45.00            | AMB       |
|               | from SCE  | e Action Litigation on 12/5 re: Pebb<br>rs status (0200)   |   |   | 0.10      | 45.00            | AMB       |
|               | Avoidanc from M. C  | e Action Litigation<br>Curan from 801 G<br>seeking info re: d                                      | rand's i                                    | response to                                       | 0.20      | 90.00            | AMB       |
|               | Avoidanc from J. M  | e Action Litigation oses re: Asteri be arty that it sold se  | n: Revi<br>ing una                          | ew email (ble to                                  | 0.10      | 45.00            | AMB       |
|               | Avoidance<br>from D.Br<br>Funding C<br>re: respon<br>distribution | e Action Litigation uglesi, counsel for Corp. and Tierra Asset to subpoena series (3900)           | n: Revi<br>r Fulton<br>Alta Fun<br>eking in | ew email<br>a Street CDC<br>ding I Corp<br>afo re |           | 45.00            | AMB       |
|               | from J. M. Company  | e Action Litigatio<br>urphy from Stand<br>in Receivership r<br>ena seeking info r                  | ard Life<br>e: info i                       | e Insurance<br>in response                        | 0.20      | 90.00            | AMB       |
|               | analysis o<br>plan and a<br>effective of                          | oyment Application of Debtors' signed attached exhibit the late effect on or clar procedures (460) | order co<br>ereto re<br>hange to            | onfirming the post                                | 1.10<br>e | 434.50           | JDG       |
|               | Avoidance<br>voicemail  | e Action Litigatio<br>from I. Silverman<br>to General Sec. N                                       | n; Revi                                     | pe of   |           | 27.50            | AHC       |
|               | Avoidance<br>letter to C  | e Action Litigation reditors Committee of discovery to sa  | n; O/c vee and e                            | v/ADR re: edits and                               | 0.20      | 55.00            | AHC       |
|               | Avoidance   | e Action Litigation<br>ffidavit of service   | n; O⁄c v                                    | v/ADR re:   | 0.10      | 27.50            | АНС       |

| Invoice #: | 3555 <sub>27</sub> mg Doc 27994-4 Filed 05/21/13<br>Pg 55 c  | 2 3 Entered 0 | 5/21/12 18:33:27 | Exhibit D |
|------------|--|---------------|------------------|-----------|
|            | Avoidance Action Litigation; Review and compile cover letter, subpoena, amended complaint, order, notice, and checks to be set to DLS for service upon Sun Life Assurance Co. for MAF (3900) | 0.40<br>nt    | 46.00            | НК        |
|            | MATTER TOTALS:   | 227.25        | \$80,155.00      |           |
| MATTER:    | 4715-005   |               |                  |           |
| RE:        | Bank of China Subpoenas  |               |                  |           |
| Dec-05-11  | Case Administration: O/C with KJM re. filed notices of subpoena issued (0200)  | 0.10          | 27.50            | FWS       |
|            | Case Administration: Reviewed as-filed versions of notices of subpoena issued (4100  | 0.40          | 110.00           | FWS       |
|            | Case Administration; Assemble final BNP,<br>Bank of America, Royal Bank of Scotland ar<br>Goldman Sachs subpoenas and ancillary doc<br>for WFD (4100)  | 0.40<br>nd    | 170.00           | KJM       |
| Dec-15-11  | Case Administration; Review subpoena response from Goldman Sachs (4100)  | 0.30          | 127.50           | KJM       |
|            | Case Administration; Email correspondence w/D. Cozens re: Goldman subpoena response (4100)   | 0.20          | 85.00            | KJM       |
|            | Case Administration; Review subpoena response from Bank of America (4100)  | 0.30          | 127.50           | KJM       |
|            | Case Administration; T/c w /counsel to BNP Paribas re: request for extension to respond t subpoena (4100)  |               | 85.00            | KJM       |
|            | Case Administration; Email correspondence w/D. Cozens re: Bank of America subpoena response and request for extension from BNI Paribas (4100)  | 0.20          | 85.00            | KJM       |
| Dec-27-11  | Case Administration: O/c w/WFD re. respon to 2004 subpoenas (0200)   | ses 0.20      | 55.00            | FWS       |
|            | Case Administration: Review subpoena issue to BofA (4100)  | ed 0.40       | 110.00           | FWS       |
|            | Case Administration: Review response to subpoena issued to BofA (4100)   | 0.20          | 55.00            | FWS       |
|            | Case Administration: T/c with counsel for Be (Melissa Goodwin) re. meet and confer for 2004 subpoenas (4100)   | oA 0.20       | 55.00            | FWS       |
|            | Case Administration: Review RBS subpoena response (4100)   | 0.20          | 55.00            | FWS       |
|            | Case Administration: T/c with counsel for RI (Staci Yablon) re. meet and confer for 2004 subpoenas (4100)  | BS 0.20       | 55.00            | FWS       |
|            | Case Administration: Review BNP subpoena   | 0.20          | 55.00            | FWS       |

(4100)

| Invoice #: | 8555 <u>-</u> mg                    | Doc 27994-4   | Filed 05/21/12<br>Pg 56 of                             | Entered 05      | 5/21/12 18:33:27 | Exhibit D | March |
|------------|-------------------------------------|---|--|-----------------|------------------|-----------|-------|
|            | Case Adn                            |   | ew BNP subpoena  | 0.30            | 82.50            | FWS       |       |
|            | Case Adn                            | ninistration: T/c wrchner) re. meet a                       | with BNP counsel and confer for 2004                   | 0.20            | 55.00            | FWS       |       |
|            | •                                   | ninistration: Revie   | ew subpoena to   | 0.30            | 82.50            | FWS       |       |
|            | Case Adn                            | ninistration: Revieuron Goldman (4                          | *  | 0.30            | 82.50            | FWS       |       |
|            | Case Adn<br>Goldman                 | ninistration: T/c an  | nd voicemail to<br>aldy) re: meet and                  | 0.20            | 55.00            | FWS       |       |
|            | Case Adn                            | ninistration: Emai<br>poenas issued and                     | l to WFD re: status                                    | 0.20            | 55.00            | FWS       |       |
|            | Case Adn                            | ninistration: Emai  | ls to/from BofA re:<br>04 subpoena (4100               |                 | 82.50            | FWS       |       |
|            | Case Adn                            | ninistration: Emai  | ls to/from RBS re:<br>04 subpoena (4100                | 0.30            | 82.50            | FWS       |       |
|            | MATTER                              | RTOTALS:  |  | 5.80            | \$1,835.00       |           |       |
| MATTER:    | 4715-006                            |   |  |                 |                  |           |       |
| RE:        | GSAM                                |   |  |                 |                  |           |       |
| Dec-01-11  | Harper re                           | ninistration: Revi<br>substituting in as<br>abpoenas (0700) | ew email from R. s counsel for Jones                   | 0.10            | 65.00            | WAM       |       |
|            | Case Adn                            | ninistration: Rev   | iew email from M. etronic search for                   | 0.10            | 65.00            | WAM       |       |
|            | Case Adn follow-up                  | ninistration: T/c ww/M. Solinger of search for docs (0      | Lehman re:   | 0.10            | 65.00            | WAM       |       |
|            | Case Adn<br>Thayer of               | ninistration: Revi<br>Jones Day re: req                     | ew RRR email to Muest for additional M. Thayer to same | <b>1</b> . 0.10 | 65.00            | WAM       |       |
| Dec-02-11  | Case Adn                            | ninistration: T/cs<br>e: GSAM dispute                       | from C. Szyfer of (0700)                               | 0.20            | 130.00           | WAM       |       |
|            | Case Adn                            | ninistration: Rev   | iew email from R.<br>M contact (0700)                  | 0.10            | 65.00            | WAM       |       |
|            | Case Adm                            |   | w/RRR re: status,<br>quired w/M.                       | 0.30            | 195.00           | WAM       |       |
|            | Case Adm<br>Stroock an<br>subpoena, |   | call w/C. Szyfer o round, status of led, proposed      | f 0.40          | 260.00           | WAM       |       |

| Invoice #: | -13555 <sub>27</sub> mg Doc 27994-4 Filed 05/21/12 E<br>Pg 57 of 70  | intered 05 | /21/12 18:33:27 | Exhibit [ |
|------------|--|------------|-----------------|-----------|
|            | Case Administration: O/c w/RRR re: follow-up with M. Solinger of Lehman re: call w/C. Szyfer of Stroock (0200)   | 0.10       | 65.00           | WAM       |
|            | Case Administration: Review email from C.<br>Szyfer of Stroock forwarding docs on GSAM (0700)  | 0.10       | 65.00           | WAM       |
|            | Case Administration: Emails to M. Solinger and others at Lehman re: docs forwarded by C. Szyfer (0700)   | 0.30       | 195.00          | WAM       |
|            | Case Administration: Emails to/from RRR re: communications w/C. Syzfer of Stroock, recent developments and next steps (0200)   | 0.20       | 130.00          | WAM       |
|            | Case Administration: Review notes from 11/29 mtg w/clients (4100)  | 0.20       | 119.00          | RRR       |
|            | Case Administration: Conf call w/WAM, C. Szyfer (Strook) re: WMD intro, next steps (4100)  | 0.20       | 119.00          | RRR       |
| Dec-05-11  | Case Administration: Review RRR email to M. Solinger of Lehman re: status of obtaining docs from GSAM and recent call w/C. Szyfer of Stroock (0700)                                      | 0.10       | 65.00           | WAM       |
|            | Case Administration: Review email from M. Solinger re docs from GSAM (0700)  | 0.10       | 65.00           | WAM       |
|            | Case Administration: Review email from J. Fox of Lehman re: docs required by subpoena to GSAM (0700)   | 0.10       | 65.00           | WAM       |
|            | Case Administration: Review emails from M. Solinger of Lehman re: scope of subpoenas and discussions w/Stroock re: same (0700)   | 0.10       | 65.00           | WAM       |
|            | Case Administration: O/c and t/c w/RRR re: status, communicating w/client on docs and narrowing subpoena, and next steps (0200)  | 0.20       | 130.00          | WAM       |
|            | Case Administration: Review emails between RRR and M. Solinger re: meeting re: reviewing subpoena and docs required (0700)   | 0.10       | 65.00           | WAM       |
|            | Case Administration: Review emails from M. Solinger and J. Fox scheduling meeting (0700)   | 0.10       | 65.00           | WAM       |
|            | Case Administration; Review GSAM discovery materials provided by Stroock (4100)  | 0.80       | 476.00          | SCB       |
|            | Avoidance Action Litigation: Review and organize GSAM's 12/2 doc production and transmit same to clients (J. Fox, R. Harper, S.  | 0.80       | 476.00          | RRR       |
|            | Pati, M. Solinger) w/explanatory email (0700)<br>Avoidance Action Litigation: Draft/send<br>detailed email to M. Solinger re: 12/2 call<br>w/Strook (C. Szyfer) re: subpoena, next steps | 0.90       | 535.50          | RRR       |

and follow up exchanges re: same (0700)

| 08-1  | 3555-mg Doc 27994-4 Filed 05/21/12<br>Pg 38 of   | 3Entered 05/2 | 21/12 18:33:27 | Exhibit D | March |
|---|--|---------------|----------------|-----------|-------|
|   | Avoidance Action Litigation: T/cs w/M. Solinger re: our 12/2 call w/Strook (C. Szyfer)   | 0.20          | 119.00         | RRR       |       |
|   | re: request to withdraw subpoena (0700) Avoidance Action Litigation: T/c w/JDG re: form of Notice of Substitution of Counsel, nex steps (0200)   | 0.30          | 178.50         | RRR       |       |
|   | Avoidance Action Litigation: T/cs w/Strook (C<br>Szyfer) re: status re: GSAM proposal to<br>proceed w/o subpoena (4100)  | C. 0.10       | 59.50          | RRR       |       |
| Dec-06-11   | Case Administration: Review email from P. Somak of Lehman re: GSAM summary file (0700)   | 0.10          | 65.00          | WAM       |       |
|   | Case Administration: Review email from J. Dziadzio of Lehman re: scope of subpoena and GSAM prior conduct (0700)   | 0.10          | 65.00          | WAM       |       |
|   | Avoidance Action Litigation; T/cs w/Jones Da (L. Sawyer) re: transitioning Jones Day file on matter to WMD, next steps (4100)  | •             | 119.00         | RRR       |       |
|   | Case Administration; O/c w/JDG re: procedure for appearing in main case in substitution with Jones Day (0200)  |               | 119.00         | JNL       |       |
|   | Case Administration; Emails from/to JDG and RRR re: appearance   | 0.30          | 178.50         | JNL       |       |
|   | Fee/Employment Applications; Review conflict<br>emails from new Lehman matter replacing<br>Jones Day to determine if scope of retention<br>needs expansion (4700)  | et 0.40       | 238.00         | JNL       |       |
|   | Fee/Employment Applications; Multiple email and calls to and from JNL and RRR re procedural requirements for Wollmuth to take over a certain new matter for the Debtors from Jones Day and subpoenas previously filed by Jones Day (4700)                            | ¢             | 158.00         | JDG       |       |
| Dec-07-11   | Case Administration: Emails w/M. Solinger of Lehman re: arranging meeting tomorrow on subpoena (0700)  | 0.10          | 65.00          | WAM       |       |
|   | Case Administration: O/c w/RRR re: meeting tomorrow w/Lehman clients on subpoena (0200)  | 0.10          | 65.00          | WAM       |       |
|   | Case Administration Review revised termination amount spreadsheet sent by Lehman; prep for mtg w/client tomorrow (4100)  | 2.40          | 1,428.00       | SCB       |       |
| respondent and the experience of the contract | Case Administration; Review and analysis of  | 0.90          | 355.50         | JDG       |       |
|   | numerous subpoenas filed by Jones Day on<br>behalf of the Debtors on 10/31/2011 (4100)<br>Case Administration; Draft notice of<br>substitution of counsel for Wollmuth to take<br>over matter for Debtors from Jones Day in<br>regard to numerous subpoenas filed by | 0.60          | 237.00         | JDG       |       |

| Invoice #: | 3555 <u>-</u> mg   | Doc 27994-4  | Filed 05/21/12<br>Pg 59 of 70  | Entered 05 | 5/21/12 18:33:27 | Exhibit |
|------------|--|--|--|------------|------------------|---------|
|            | Jones Day<br>10/31/201   | on behalf of the 1 (4700)  | Debtors on   |            |                  |         |
| Dec-08-11  | Case Adn   |  | v/RRR re: meeting  | 0.20       | 130.00           | WAM     |
|            | Case Adn   | ninistration: Revi   | ew RRR email to L.   | 0.10       | 65.00            | WAM     |
|            | Case Adn<br>RRR and  | ninistration: Revie<br>C. Szyfer of Stroc<br>cuss subpoena (41               |  | 0.10       | 65.00            | WAM     |
|            | Case Adm<br>meeting a<br>C. Carman<br>SCB re: so<br>issues and | ninistration: Partion Mong M. Solinger and S. Pati of Leubpoena and detail   | cipate by conf call in<br>c, J. Fox, R. Harper,<br>chman, RRR and<br>led review of same,<br>tions w/GSAM re: | 1.70       | 1,105.00         | WAM     |
|            | Case Adm   |  | v/RRR to prep for  | 0.30       | 178.50           | SCB     |
|            | Case Adm<br>M. Soling<br>of subpoe                             | ninistration Mtg at  | R. Harper re: scope  | 1.90       | 1,130.50         | SCB     |
|            | Case Adm<br>JDG's dra  | ninistration; Revie<br>ft of Notice of Sub                                   | w/finalize/circulate<br>ostitution of WMD  | 0.60       | 357.00           | RRR     |
|            | Case Adm<br>Solinger,  | Day (4100)<br>ninistration; Mtg a<br>R. Harper, J. Fox,<br>g/narrowing doc s |  | 1.80       | 1,071.00         | RRR     |
|            | Case Adm<br>GSAM's 1   | e: prioritizing/narr   | n in prep for mtg at   | 1.10       | 654.50           | RRR     |
|            | Case Adm   | inistration; Meet ons from GSAM's  |  | 0.30       | 178.50           | RRR     |
|            | Lehman's   | ninistration; T/c wants  | •  | 0.70       | 416.50           | RRR     |
|            |  | (4100)<br>inistration: Meet  |  | 0.30       | 178.50           | RRR     |

observations from GSAM's 12/2 doc

of substitution of counsel (4700)

to and from SCB, RRR, WAM, and

Travel; Travel to/from Lehman office for mtg

Sawyer re latest draft of stipulation and notice

Fee/Employment Applications; Multiple emails

re: prioritizing/narrowing doc subpoena (0500) Fee/Employment Applications; Email to L.

0.70

0.10

0.30

416.50

39.50

118.50

RRR

**JDG** 

JDG

production (0200)

Dec-09-11

D

| Invoice #: | 3555-mg Doc 27994-4 Filed 05/21/12<br>Pg <sup>a</sup> 60 of 3   | Entered 05/ | 21/12 18:33:27 | Exhibit D |
|------------|---|-------------|----------------|-----------|
|            | JNL re how time for this new matter should be coded pursuant to all latest instructions and rules from Fee Committee Counsel (4600)   |             |                |           |
| Dec-12-11  | Case Administration: T/c w/RRR re: status and subpoena response date (0200)   | 0.10        | 65.00          | WAM       |
|            | Case Administration: Review RRR email to M. Solinger of Lehman re: summary of call w/C. Szyfer of Stroock re: subpoena (0700)   | 0.10        | 65.00          | WAM       |
|            | Case Administration: Review email from M. Solinger of Lehman scope of subpoena and  | 0.10        | 65.00          | WAM       |
|            | response to Stroock (0700) Case Administration: Review email from RRR to J. Fox of Lehman re: detailed summary of call w/C. Szyfer of Stroock re: subpoena, extension of GSAM time to respond to subpoena and next steps (0700) | 0.10        | 65.00          | WAM       |
|            | Case Administration; Draft/send detailed email to M. Solinger, J. Fox, R. Harper, WAM, SCB re: my discussions w/GSAM's counsel re: next steps re: subpoena (0700)   | 0.90        | 535.50         | RRR       |
| Dec-13-11  | Case Administration: Review email from M. Solinger of Lehman re: communications among business people, and review emails between RRR and M. Solinger re: same (0700)  | 0.20        | 130.00         | WAM       |
|            | Case Administration: Review email from RRR re: Jones Day approval of stipulation of substitution of counsel and review stipulation of substitution of counsel (0200)  |             | 130.00         | WAM       |
|            | Case Administration: Review email from R. Harper of Lehman re: GSAM's position on subpoena and the prior position of W. Yun of GSAM (0700)  | 0.10        | 65.00          | WAM       |
|            | Case Administration: Review RRR email to C. Szyfer of Stroock re: stipulation of substitution of counsel (4100)   |             | 65.00          | WAM       |
|            | Case Administration; T/c w/R. Slack (Weil) re: 2004 concerns w/r/t taking firm claim position w/GSAM, next steps re: letter re: Alpa fund reserve request (0700)  | 0.10        | 59.50          | RRR       |
|            | Fee/Employment Applications; Review final substitution of counsel form (4700)   | 0.10        | 59.50          | JNL       |
|            | Fee/Employment Applications; Review notice of filing of substitution (4700)   | 0.10        | 59.50          | JNL       |
|            | Fee/Employment Applications; Review emails confirming substitution of counsel filing and arranging service through Epiq; and confirmation of same (4700)  | 0.50        | 297.50         | JNL       |
|            | Case Administration; Review and analysis of al R. 2004 subpoena notices filed by Jones  | 1 0.40      | 158.00         | JDG       |

| Invoice #: | 13555-mg Doc 27994-4 Filed 05/21/12 . Pg 1 of 70   | Entered 0 | 5/21/12 18:33:27 | Exhibit D |
|------------|--|-----------|------------------|-----------|
|            | Day re issues with service of the Notice of<br>Substitution of Counsel substituting Wollmuth<br>for Jones Day as Debtors' counsel (4100)<br>Case Administration; Call with C. Arthur re<br>issues with service of the Notice of Substitution | 0.10      | 39.50            | JDG       |
|            | of Counsel substituting Wollmuth for Jones Day<br>as Debtors' counsel (0700)<br>Case Administration; Multiple emails to and  | 0.40      | 158.00           | JDG       |
|            | from RRR, WAM and Cassandra Murray at Epiq re issues with service of the Notice of Substitution of Counsel substituting Wollmuth for Jones Day as Debtors' counsel (0200)  | 0.70      | 130.00           | ,DG       |
| Dec-14-11  | Case Administration: Review emails between RRR and C. Szyfer of Stroock re: Goldman's objections to subpoenas and production of additional docs (4100)   | 0.20      | 130.00           | WAM       |
|            | Case Administration; Email to clients (M. Solinger, J. Fox, etal) w/GSAM's written objections to subpoenas (0700)  | 0.10      | 59.50            | RRR       |
|            | Case Administration; Email from D. Streany of Epiq re Service of Notice of Substitution of Counsel [Docket No. 23268] (4100)   | 0.10      | 39.50            | JDG       |
| Dec-15-11  | Case Administration: Review email from J. Fox of Lehman re: status and review attached outline of issues (0700)  | 0.20      | 130.00           | WAM       |
|            | Case Administration: Review RRR email to M. Solinger of Lehman re: additional, small doc production by GSAM (0700)   | 0.10      | 65.00            | WAM       |
|            | MATTER TOTALS:   | 26.70     | \$15,606.00      |           |
| MATTER:    | 4715-007   |           |                  |           |
| RE:        | Katten Muchin Dispute  |           |                  |           |
| Dec-01-11  | Litigation-Other than Avoidance Action<br>Litigation: O/cs w/RRR re: status and service<br>of complaint upon Katten (0200)   | 0.30      | 195.00           | WAM       |
|            | Litigation-Other than Avoidance Action<br>Litigation: T/c from L. Jones of Reuters re:<br>new lawsuit (3900)   | 0.10      | 65.00            | WAM       |
|            | Litigation-Other than Avoidance Action<br>Litigation: Send email to M. Solinger of<br>Lehman re: Reuters press inquiry (0700)  | 0.10      | 65.00            | WAM       |
|            | Litigation-Other than Avoidance Action Litigation: Forward summons and complaint to M. Verde of Katten w/cover note (3900)   | 0.20      | 130.00           | WAM       |
|            | Litigation-Other than Avoidance Action Litigation: Forward email w/M. Verde of Katten to M. Solinger of Lehman w/cover note (0700)   | 0.10      | 65.00            | WAM       |

| Invoice #: | -13555-mg Doc 27994-4 Filed 05/21/12<br>22186 Pg <sup>4</sup> 62 of 7  |      | /21/12 18:33: | 27 Exhibit D |
|------------|--|------|---------------|--------------|
|            | Litigation-Other than Avoidance Action<br>Litigation: Send email to M. Solinger and J.<br>Halperin of Lehman re: obtaining Katten files,<br>and review responses from M. Solinger and J.<br>Halperin re: same (0700) | 0.30 | 195.00        | WAM          |
|            | Litigation-Other than Avoidance Action<br>Litigation: T/c from L. Hoffman of Law360 re:<br>new lawsuit (3900)  | 0.10 | 65.00         | WAM          |
|            | Litigation-Other than Avoidance Action Litigation: Send email to M. Solinger of Lehman re: new press inquiry and forward Reuters newspiece (0700)  | 0.20 | 130.00        | WAM          |
|            | Litigation-Other than Avoidance Action Litigation: T/c w/RRR re: service of process upon Katten and review email from RRR re: same (0200)  | 0.10 | 65.00         | WAM          |
|            | Litigation-Other than Avoidance Action Litigation: Send email to M. Solinger of Lehman confirming service of summons and complaint upon Katten (0700)  | 0.10 | 65.00         | WAM          |
|            | Litigation-Other than Avoidance Action<br>Litigation: Review email from M. Solinger of<br>Lehman re: loan files (0700)   | 0.10 | 65.00         | WAM          |
| Dec-02-11  | Litigation-Other than Avoidance Action<br>Litigation: O/c and t/c w/RRR re: status,<br>contacting potential witnesses and acquiring<br>additional information (0200)   | 0.20 | 130.00        | WAM          |
|            | Litigation-Other than Avoidance Action<br>Litigation: Review proposed letter from RRR<br>to Orrick re: obtaining docs (3900)   | 0.20 | 130.00        | WAM          |
|            | Litigation-Other than Avoidance Action<br>Litigation: Emails to/from RRR re: obtaining<br>background docs, status and next steps (0200)  | 0.20 | 130.00        | WAM          |
|            | Litigation-Other than Avoidance Action Litigation: Draft letter to Orrick requesting return of Lehman files and forward same to WAM for review (3900)  | 1.10 | 654.50        | RRR          |
| Dec-03-11  | Litigation-Other than Avoidance Action<br>Litigation: Review email from RRR to M.<br>Solinger of Lehman re: obtaining files from<br>Orrick (0700)  | 0.10 | 65.00         | WAM          |
| Dec-05-11  | Litigation-Other than Avoidance Action<br>Litigation: Review emails between RRR and<br>M. Solinger of Lehman re: obtaining Orrick<br>files (0700)  | 0.10 | 65.00         | WAM          |
|            | Litigation-Other than Avoidance Action<br>Litigation: Emails to/from Wexelman re:<br>litigation status (0700)  | 0.10 | 65.00         | WAM          |
|            | Litigation-Other than Avoidance Action<br>Litigation: O/c w/RRR re: call w/P. Wexelman<br>of Lehman re: sale of notes, title insurance and   | 0.20 | 130.00        | WAM          |

|           | 9  |      |          |     |
|-----------|--|------|----------|-----|
|           | claim against Katten, and issues relating thereto (0200)   |      |          | ,   |
|           | Litigation-Other than Avoidance Action Litigation: Finalize letter to Orrick w/M. Solinger (0700)  | 0.20 | 119.00   | RRR |
|           | Litigation-Other than Avoidance Action<br>Litigation: T/cs w/P. Wexelman re: advice re:<br>title insurance/subrogation issues w/Note buyer   | 0.50 | 297.50   | RRR |
|           | (0700) Litigation-Other than Avoidance Action Litigation: Place follow up phone calls to former Lehman employees re: background info (3900)  | 0.20 | 119.00   | RRR |
|           | Litigation-Other than Avoidance Action Litigation; Witness Martha Solinger counter sign a letter to P. Bicks requesting files, for RRR(3900)   | 0.40 | 46.00    | НК  |
| Dec-06-11 | Litigation-Other than Avoidance Action Litigation: Review email from P. Wexelman of Lehman re: potential sale of note and assignment of claims (0700)  | 0.10 | 65.00    | WAM |
|           | Litigation-Other than Avoidance Action<br>Litigation: T/c w/RRR re: email from P.<br>Wexelman of Lehman and next steps (0200)  | 0.10 | 65.00    | WAM |
|           | Litigation-Other than Avoidance Action Litigation: Review emails between RRR and P. Wexelman of Lehman re: materials needed to advise on issue raised re: potential sale of note and assignment of claims (0700) | 0.20 | 130.00   | WAM |
|           | Litigation-Other than Avoidance Action Litigation; T/c w/P. Wexelman re: questions to analyze re: title insurance claims/Katten mitigation defense (0700)  | 0.30 | 178.50   | RRR |
|           | Litigation-Other than Avoidance Action Litigation; Review title insurance polices and loan sale agmt w/r/t title insurance claim question raised by client (3900)  | 1.80 | 1,071.00 | RRR |
|           | Litigation-Other than Avoidance Action<br>Litigation; O/cs w/MAF re: legal research<br>assignment re: title insurance claim questions<br>raised by client (0200)   | 0.70 | 416.50   | RRR |
|           | Litigation-Other than Avoidance Action Litigation; Review email from MAF w/initial legal research findings re: title insurance claim issue and reply to same (0200)  | 0.10 | 59.50    | RRR |
|           | Litigation-Other than Avoidance Action Litigation; Perform legal research re: duty to file insurance claims/mitigation of damages (3900)   | 1.10 | 654.50   | RRR |

| 08-13<br>Invoice #: | 3555 <sub>-</sub> mg Doc 27994-4 Filed 05/2<br>Pg  | 21/12 Entered<br>64 of 70 | 05/21/12 18:33:27 | Exhibit D |
|---------------------|--|---------------------------|-------------------|-----------|
|                     | Litigation-Other than Avoidance Action<br>Litigation: O/c with RRR re: researching<br>to mitigate damages by failing to take<br>advantage of insurance (0200)  |                           | 50.00             | MAF       |
|                     | Litigation-Other than Avoidance Action<br>Litigation: Research failure to mitigate of<br>by failing to take advantage of insurance<br>(3900)   | damages                   | 675.00            | MAF       |
| Dec-07-11           | Litigation-Other than Avoidance Action<br>Litigation: Review emails between P.<br>Wexelman of Lehman and RRR re: pote<br>sale of note, title insurance policy, poten<br>claim against Katten re: same (0700) | ential                    | 130.00            | WAM       |
|                     | Litigation-Other than Avoidance Action<br>Litigation: O/c w/RRR re: status of Karissues (0200)   |                           | 65.00             | WAM       |
|                     | Litigation-Other than Avoidance Action<br>Litigation; Continue reviewing title insu-<br>policies w/r/t coverage, exclusions, cont-<br>insurance for purchase of loan (3900)                                  | ırance                    | 714.00            | RRR       |
|                     | Litigation-Other than Avoidance Action<br>Litigation; T/c w/FWS re: legal research<br>assignment re: statutory status of mecha<br>(0200)   | i                         | 59.50             | RRR       |
|                     | Litigation-Other than Avoidance Action<br>Litigation; Conf call w/Lehman (J. Halp<br>Wexelman), MAF re: analysis/discussion<br>insurance/mitigation of damages question<br>were asked to analyze (0700)      | perin, P. on of title     | 476.00            | RRR       |
|                     | Litigation-Other than Avoidance Action<br>Litigation; Review legal research findin<br>MAF, FWS re: title insurance/mitigatio<br>damages issues and make notes summar<br>same (3900)                          | gs from<br>n of           | 1,011.50          | RRR       |
|                     | Litigation-Other than Avoidance Action<br>Litigation: Perform legal research on mo-<br>liens (3900)  |                           | 440.00            | FWS       |
|                     | Litigation-Other than Avoidance Action<br>Litigation; Draft memo re. mechanics li<br>relevant to complaint (3900)  |                           | 247.50            | FWS       |
|                     | Litigation-Other than Avoidance Action<br>Litigation: O/c w/ RRR re: duty to mitig<br>research (0200)  |                           | 25.00             | MAF       |
|                     | Litigation-Other than Avoidance Action<br>Litigation: Phone call with RRR, Pami a<br>Joelle re: title insurance policy language<br>duty to mitigate, in connection with the<br>loan (3900)                   | and<br>e and              | 225.00            | MAF       |
| Dec-08-11           | Litigation-Other than Avoidance Action Litigation: Review emails between P. Weyelman of Lehman and RRR re-   | 0.10                      | 65.00             | WAM       |

Wexelman of Lehman and RRR re:

| Invoice #: | 13555-mg<br>22186                           | Doc 27994-4   | Filed 05/21/12<br>Pg <sup>a</sup> 65 of                             |           | 05/21/12 18:33:27 | Zexhibit D |
|------------|---|---|---|-----------|-------------------|------------|
|            |   | ale of notes and i  | mplications on  |           |                   |            |
|            | Litigation                                  | nal language for l  | exelman's request   | 0.30      | 178.50            | RRR        |
| Dec-09-11  | to and from<br>for this ne<br>all latest in | m SCB, RRR, and   | ons; Multiple emaild WAM re how time coded pursuant to les from Fee | e         | 79.00             | JDG        |
| Dec-12-11  | Litigation                                  | Other than Avoid<br>T/c w/RRR re:<br>witnesses and nex                        | status of contacting  | 0.10      | 65.00             | WAM        |
| Dec-13-11  | Litigation extension (3900)                 | Other than Avoid<br>T/c from A. Lin<br>of time to respond                     | ker of Katten re:<br>d to complaint                                 | 0.10      | 65.00             | WAM        |
|            | Litigation                                  | -Other than Avoice r<br>Forward voice r<br>struction and t/c v                | nail message to   | 0.10      | 65.00             | WAM        |
|            | Litigation                                  |   | lance Action<br>his call w/A. Linker<br>l next steps (0200)         |           | 65.00             | WAM        |
|            | Litigation<br>Litigation                    | Other than Avoid<br>Prep questions f<br>and place follow                      | dance Action or potential   | 0.30      | 178.50            | RRR        |
| Dec-14-11  | Litigation                                  | r extension of tim  | status and Katten   | 0.20      | 130.00            | WAM        |
|            | Litigation Muchin's                         | Other than Avoid<br>The w/M. Soling<br>request for extens<br>Complaint, relat | er re: Katten<br>ion of time to                                     | 0.20      | 119.00            | RRR        |
|            | Litigation<br>Litigation<br>response t      | Other than Avoic<br>T/c w/Katten Moorequest for exten<br>Complaint, prep      | lance Action<br>uchin (A. Linker) re<br>nsion of time to            | 0.10      | 59.50             | RRR        |
| Dec-15-11  | Litigation<br>Litigation<br>A. Linker       | Other than Avoic<br>Review emails   | between RRR and lest for extension of                               | 0.10      | 65.00             | WAM        |
|            | Litigation<br>Litigation                    | Other than Avoid  | lance Action ed stipulation sent b                                  | 0.10<br>y | 65.00             | WAM        |

| Invoice # | 08-13555-mg<br>#: 22186                 | Doc 27994-4   | Filed 05/21/12<br>Fig. 66 of 47                      |        | 05/21/12 18:33:: | 27 Exhibit D | March |
|-----------|---|---|--|--------|------------------|--------------|-------|
|           | Litigation                              | Other than Avoid<br>Review emails fr<br>I from RRR re: ob           | om P. Bicks of                                       | 0.20   | 130.00           | WAM          |       |
|           | Litigation                              | 0)<br>-Other than Avoid<br>: T/c w/RRR re: h<br>of Lehman re: pote  | is call w/J.   | 0.10   | 65.00            | WAM          |       |
|           | Litigation                              | -Other than Avoid<br>; T/c w/J. Halperir<br>ak to former Lehn       | re: status of efforts                                | 0.10   | 59.50            | RRR          |       |
|           | Litigation                              | -Other than Avoid<br>; Draft/send follow<br>rick) requesting tr     |  | 0.30   | 178.50           | RRR          |       |
|           | follow up<br>Litigation<br>Litigation   | emails from Bicks -Other than Avoid ; Draft/finalize let            | s re: same (3900)<br>ance Action                     | 0.40   | 238.00           | RRR          |       |
| Dec-16-11 | Litigation<br>M. Soling                 | -Other than Avoid<br>: Review emails be<br>er of Lehman re: J       |  | 0.10   | 65.00            | WAM          |       |
|           | Litigation<br>A. Linker                 | Other than Avoid: Review emails to of Katten re: stipu              | netween RRR and allation extending                   | 0.10   | 65.00            | WAM          |       |
|           | Litigation<br>Litigation<br>letter to D | . Crichlow re: req  | lance Action nger's signature for                    | 0.60   | 69.00            | НК           |       |
| Dec-21-11 | Litigation<br>Pillsbury                 | -Óther than Avoid<br>: Review RRR en<br>re: Katten subpoer          | lance Action nail to D. Keyco of na to Pillsbury and | 0.10   | 65.00            | WAM          |       |
|           | Litigation<br>Litigation                | sues (3900)  -Other than Avoid  : O/c w/RRR re: and next steps (02) | Katten subpoena to                                   | 0.10   | 65.00            | WAM          |       |
|           | MATTER                                  | TOTALS:   |  | 24.20  | \$12,014.00      |              |       |
|           | Totals                                  |   |  | 283.95 | \$109,610.00     |              |       |

## EXHIBIT B

08-13555-mg Doc 27994-4 Filed 05/21/12 Entered 05/21/12 18:33:27 Exhibit D Pg 68 of 70

DISBURSEMENTS

Disbursements

Receipts

MATTER:

4715-001

RE:

SPV Avoidance Litigation

Federal Express Inv #

955.79

| Invoice #: | 3-13555-mg                   | Doc 27994-4                              | Filed 05/21/12<br>Pg 69 of | Entered 05/21/12 18:33:27 | Exhibit D                     | March |
|------------|------------------------------|--|----------------------------|---------------------------|-------------------------------|-------|
|            | Photocopy Ex                 | xpense                                   |                            | 12.45                     |                               |       |
| Dec-06-11  | * *                          | Service of Process                       | S                          | 40.00                     |                               |       |
|            | Subpoena Fe                  | es - Terwin Capita                       | ıl LLC (Mileage            | 6.00                      |                               |       |
|            | Fee)                         | -  | ` <del>-</del>             |                           |                               |       |
|            | Witness Fees                 | - Terwin Capital                         | LLC                        | 40.00                     |                               |       |
| Dec-08-11  | -                            | sionals - Research                       | *                          | 225.00                    |                               |       |
|            | -                            | ocess on foreign en                      | *                          |                           |                               |       |
| Dec-13-11  | •                            | es - Royal Bancsh                        |                            | 6.00                      |                               |       |
|            | -                            | , Inc. (Mileage Fe                       | *                          |                           |                               |       |
|            |                              | - Royal Bancshar                         | res of                     | 40.00                     |                               |       |
| D 14.11    | Pennsylvania                 |  | # 20012 <i>5</i>           |                           |                               |       |
| Dec-14-11  |                              | awyer Service Inv                        |                            | 282.45                    |                               |       |
|            |                              | awyer Service Inv                        |                            | 302.45                    |                               |       |
|            | •                            | awyer Service Inv                        |                            | 267.45                    |                               |       |
|            |                              | awyer Service Inv.<br>awyer Service Inv. |                            | 552.72<br>186.62          |                               |       |
| Dec-19-11  |                              | es - Tierra Alta F                       |                            | 13.00                     |                               |       |
| DCC-17-11  | (Mileage Fee                 | )  | - "                        | 13.00                     |                               |       |
|            | Subpoena Fed<br>Fund (Mileag | es - Illinois Munic<br>ge Fee)           | ipal Retirement            | 23.00                     |                               |       |
|            | •                            | es - Genworth Life<br>LV STISL (Mil      | _                          | 24.00                     |                               |       |
|            | Subpoena Fee                 | es - Genworth Life<br>LV SPIA (Mile      | e and Annuity              | 24.00                     |                               |       |
|            |                              | es - Lancer Fundir                       | · ·                        | 62.00                     |                               |       |
|            | ` •                          | es - Stifel, Nicola                      | us & Company,              | 10.00                     |                               |       |
|            |                              | es - Putnam Fiduc                        | iary Trust Co.             | 7.00                      |                               |       |
|            | •                            | - Tierra Alta Fun                        | ding I Corn                | 40.00                     |                               |       |
|            |                              | - Illinois Municip                       |                            | 40.00                     |                               |       |
|            | Fund                         | **************************************   |                            | 70.00                     |                               |       |
|            | Witness Fees<br>Insurance Co | - Genworth Life a                        | and Annuity                | 40.00                     |                               |       |
|            |                              | - Genworth Life a                        | and Annuity                | 40.00                     |                               |       |
|            | Insurance Co                 |  | ind Amunty                 | 40.00                     |                               |       |
|            |                              | - Lancer Funding                         | •                          | 40.00                     |                               |       |
|            | Witness Fees                 | - Stifel, Nicolaus                       | & Company,                 | 40.00                     |                               |       |
|            | Inc.                         |  |                            |                           |                               |       |
|            |                              | - Putnam Fiducia                         | -                          | 40.00                     |                               |       |
| Dec-20-11  | -                            |  |                            |                           | ·- And a second second second |       |
|            |                              | Indiana (Mileage F                       | ,                          |                           |                               |       |
|            |                              | es - The Phoenix C                       |                            | 11.00                     |                               |       |
|            | - Prioentx Hot               | me Life Variable I                       | insurance                  |                           |                               |       |

Company (Mileage Fee)

| 08-13<br>Invoice #: | 3555-mg<br>22186 | Doc 27994-4                            | Filed 05/21/12<br>Pg <sup>a</sup> #0 of | Entered 05/21/12 18:33:27 | Exhibit D | March |
|---------------------|------------------|--|---|---------------------------|-----------|-------|
| - I                 | -                | es - The Phoenix (<br>e Insurance Comp |   | 11.00                     |           |       |

\$3,943.29

|           | Subpoena Fees - The Phoenix Companies, Inc Phoenix Life Insurance Company (Mileage Fee)                   | 11.00                                   |
|-----------|---|---|
|           | Subpoena Fees - Fulton Street CDO Funding<br>Corp. (Mileage Fee)  | 62.00                                   |
|           | Witness Fees - Standard Life Insurance<br>Company of Indiana  | 40.00                                   |
|           | Witness Fees - The Phoenix Companies, Inc Phoenix Home Life Variable Insurance Company                    | 40.00                                   |
|           | Witness Fees - The Phoenix Companies, Inc<br>Phoenix Life Insurance Company                               | 40.00                                   |
|           | Witness Fees - Fulton Street CDO Funding Corp.  | 40.00                                   |
| Dec-21-11 | Subpoena Fees - General Security National Insurance (Mileage Fee)   | 10.00                                   |
|           | Witness Fees - Marsh & McLennen CoMarsh & McLennan Retirement Trust                                       | 40.00                                   |
|           | Witness Fees - Marsh & McLennan CoMarsh & McLennan Retirement Trust (Mileage Fee)                         | 8.00                                    |
|           | Witness Fees - General Security National Insurance  | 40.00                                   |
| Dec-28-11 | Subpoena Fees - LaSalle Bank National<br>Association, Trustee for Lancer Funding II,<br>LLC (Mileage Fee) | 6.00                                    |
|           | Witness Fees - LaSalle Bank National Association, Trustee for Lancer Funding II, LLC                      | 40.00                                   |
| Dec-29-11 | Subpoena Fees - Sun Life Assurance Co. of Canada US- Sun US MVA (Mileage Fee)                             | 6.00                                    |
|           | Witness Fees - Sun Life Assurance Co. of Canada US-Sun US MVA   | 40.00                                   |
| Dec-31-11 | Copper Conferencing Inv.# 619977  | 129.36                                  |
|           | MATTER TOTALS:  | \$3,943.29                              |
|           |   | *************************************** |

Totals